		mithitela Foods, inc.	T		May 24, 2010
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1		that you made an allegation that he pointed at	1	Q.	Okay. Was this before December 12th, 2014, or
2		his penis.	2		the same day you said that?
3	A.	(In English without translation of question)	3	A.	It happened when Gary was at that time Gary
4		Right.	4		was on vacation and when it happened, so he told
5	Q.	Okay. And he did that in December of 2014?	5		Rusty, Rusty, and Rusty separate us and he
6	Α.	(In English without translation of question)	6		started working on his own place and he put me
7		Right.	7		he put him on his own place and he put me on the
8	Q.	Is that am I correct about that?	8		other place, but I was waiting to report that
9	A.	(In English without translation of question)	9		to
10		That's when I went down there to to speak	10		THE WITNESS: No.
11		on December 24.	11		(Sotto voce discussion between witness and
12	Q.	Okay. And tell me what he did. I think it was	12		interpreter.)
13		December 12th, or something like that, of 2014	13		THE INTERPRETER: I was satisfied when I
14		according to the notes that I have. And it says	14		report to Rusty and Rusty separate us
15		that he made a gesture, he pointed at his penis.	15		separated us.
16		Is that what you remember?	16		BY MS. CALEM:
17	Α.	(In English without translation of question)	17	Q.	Okay. And did that happen on December 12th or a
18		Yeah. I remember that day. We was walk	18		different day before December 12th, 2014?
19	16	together like what Yvette she said before. Juan	19	Α.	(In English) It occurred before December 12th.
20		was on this side taking the net, put on the horn,	20		(Through interpreter) It was before December
21		and I can't remember the other guy, he was	21		12th.
22		572 F F F F F F F F F F F F F F F F F F F	22	Q.	And do you remember when it was?
23		pushing the meat like that. And I was grab it	23	A.	It was in December but not not sure exactly
24		down and clipping. So when he put net and he	24	Α.	the date.
25		would have called me like (indicating), you know,	25	Q.	So in December but earlier in December?
23		call me	20	ν.	Ve-seo
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-33	Q.	For the record, she's making a gesture that he	1	A.	It was a week before December 12th.
2	Q. A.	(In English without translation of question)	2	A. Q.	About a week before December 12th. Did anybody
2 3		(In English without translation of question) called me, like, come and touch my penis,	2	Q.	About a week before December 12th. Did anybody see Juan do this except for you?
2 3 4		(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he	2 3 4		About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another
2 3 4 5		(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a	2 3 4 5	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to
2 3 4	A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he	2 3 4 5 6	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another
2 3 4 5 6 7		(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay.	2 3 4 5 6 7	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No.
2 3 4 5 6 7 8	A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me	2 3 4 5 6 7 8	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott.
2 3 4 5 6 7 8 9	A. Q.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay.	2 3 4 5 6 7 8 9	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No.
2 3 4 5 6 7 8 9	A. Q.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like	2 3 4 5 6 7 8 9	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way
2 3 4 5 6 7 8 9 10	A. Q. A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating).	2 3 4 5 6 7 8 9 10	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started
2 3 4 5 6 7 8 9 10 11 12	A. Q. A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed	2 3 4 5 6 7 8 9 10 11 12	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way
2 3 4 5 6 7 8 9 10 11 12 13	Q. Α. Q.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts?	2 3 4 5 6 7 8 9 10 11 12 13	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started
2 3 4 5 6 7 8 9 10 11 12 13	Q. Α. Q.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question)	2 3 4 5 6 7 8 9 10 11 12 13 14	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you?
2 3 4 5 6 7 8 9 10 11 12 13	Д. Q. Д.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad
2 3 4 5 6 7 8 9 10 11 12 13	Д. Q. Д.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it	2 3 4 5 6 7 8 9 10 11 12 13 14	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Д. Д. Д.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Д. Д. Д.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture? (In English without translation of question)	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Q. A. Q. A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture? (In English without translation of question) Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay. (In English) So make too much meat and another
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Q. A. Q. A. Q.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture? (In English without translation of question) Yes. And how many times did he do that?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay. (In English) So make too much meat and another one he might have push and the meat will come
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. Q. A. Q. A. Q.	<pre>(In English without translation of question)</pre>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay. (In English) So make too much meat and another one he might have push and the meat will come through to my feet. That time I was crying. And
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q. A. Q.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture? (In English without translation of question) Yes. And how many times did he do that? (In English without translation of question) It was once because Let me Sorry.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay. (In English) So make too much meat and another one he might have push and the meat will come through to my feet. That time I was crying. And Donna, she said, Don't cry about Juan, okay.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A. Q. A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture? (In English without translation of question) Yes. And how many times did he do that? (In English without translation of question) It was once because Let me Sorry. (Sotto voce between witness and interpreter.)	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay. (In English) So make too much meat and another one he might have push and the meat will come through to my feet. That time I was crying. And Donna, she said, Don't cry about Juan, okay. Then Kamesu, she asking him, why are you doing
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A. Q. A. Q. A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture? (In English without translation of question) Yes. And how many times did he do that? (In English without translation of question) It was once because Let me Sorry. (Sotto voce between witness and interpreter.) I told it was the one time. I told him you	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay. (In English) So make too much meat and another one he might have push and the meat will come through to my feet. That time I was crying. And Donna, she said, Don't cry about Juan, okay. Then Kamesu, she asking him, why are you doing this to Sala, and he said, I don't care.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. Q. A. Q. A.	(In English without translation of question) called me, like, come and touch my penis, come and touch my penis (indicating), but he didn't talk on the words words but he make a sign, call me Okay. and grab his his private party [sic] like this (indicating). So he sort of pointed at you and then he grabbed his private parts? (In English without translation of question) Yeah. Okay. And he didn't say anything verbally, it was the gesture? (In English without translation of question) Yes. And how many times did he do that? (In English without translation of question) It was once because Let me Sorry. (Sotto voce between witness and interpreter.) I told it was the one time. I told him you are nasty and disgusting, you're not supposed to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. A.	About a week before December 12th. Did anybody see Juan do this except for you? When we were working, so Kamesu is another employee, he asked why are you doing that to Scott. THE WITNESS: No. No. When when when he show me the sign and I tell him it's nasty so he started to work with me in bad way THE INTERPRETER: He started COURT REPORTER: He started what with you? THE WITNESS: Working bad MS. CALEM: Working in a bad way with you. THE WITNESS: Yeah. COURT REPORTER: Okay. (In English) So make too much meat and another one he might have push and the meat will come through to my feet. That time I was crying. And Donna, she said, Don't cry about Juan, okay. Then Kamesu, she asking him, why are you doing this to Sala, and he said, I don't care. BY MS. CALEM:

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1	A.	(In English without translation of question)	1		BY MS. CALEM:
2		Yeah. That when I reported him a week	2	Q.	Well, were you there when Gary did you hear
3		after week after December 12	3		Gary say that to Scott Reed?
4	Q.	Uh-huh.	4	A.	(In English without translation of question)
5	A.	I report him to Rusty and then Rusty separate	5		That's how I got interviewed inside.
6		us. Then when when when Gary come back to	6	Q.	Yeah. But did you hear Gary say to Scott Reed,
7		vacation, then things happen again.	7		"She's lazy and she doesn't want to work"?
8	Q.	Okay. So Gary comes back from vacation, you're	8	A.	(In English without translation of question)
9		working on the same line with Juan again?	9		No.
10	A.	(In English without translation of question)	10	Q.	Okay.
11		No. Wasn't.	11	A.	(In English without translation of question)
12	Q.	You were not on the same line?	12	2	No.
13	A.	(In English without translation of question)	13	Q.	You don't know what he said to Scott Reed, do
14		Yeah. I was to another line when Rusty told	14		you?
15		me to clip in another line, Handy [sic] line.	15	A.	(In English without translation of question)
16	Q.	Okay. And when this happened on December 12th,	16		I heard somebody say he went to say that to
17		though, you and Juan were on different lines?	17		Scott Reed, but Juan, he said, I was there with
18	A.	(In English without translation of question)	18		my ears. I was there with Juan, Scott Reed in
19		When it happened, Gary came in the morning,	19		the meeting. Juan, he says, she's lazy, she
20		because at that time I was open work, I wasn't	20		can't do job and that's why this is happening.
21		have assigned job. So when Gary come, he told me	21	Q.	Okay. So Juan said that you were working too
22		to go to work with the Juan and I was	22		slowly, right?
23		uncomfortable to work with the Juan. So I told	23	A.	(In English without translation of question)
24		Gary, I don't want to work with the him. Rusty	24		Yeah.
25		already separate with the him. He's like, why,	25	Q.	Okay. Did he say the word "lazy"?
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1		and I said, No, the words he told me, I don't	1	A.	(In English without translation of question)
2		like to work with the him. And Gary is, like,	2		Yes.
3		You don't want to get along with the people,	3	Q.	In front of Scott Reed?
4		don't you? And I said, No, it's not that way.	4	A.	(In English without translation of question)
5		And I ask him, Do ask him he had to touch a man	5		Yes.
6		penis, and he's like, Whoa, whoa, whoa, that's	6	Q.	So as I understand it, Gary comes back from
7		what you try to do? I will get you. That's what	7	-	vacation, he doesn't know what's happened that
8		he told me, Gary, I will get you.	8		Rusty separated you.
9		And then he call David and Steve. They take	9	A.	(In English without translation of question)
10		me to to office. So when I was in the office,	10		Right.
11		I started crying and Gary asking me, Why you cry?	11	Q.	He told you, you work with Juan and you said, no,
12		I said, You was yelling at me in front of bunch	12	#.	I don't want to?
13		of people and telling me you will get me, I'm	13	A.	(In English without translation of question).
14		going to kill. Why you say you will get me?	14		Right.
15		What kind of get will you get me? So, oh, I was	15	Q.	And he got angry at you
16		just say that whatever, you know. So that's what	16	_	(In English without translation of question)
17			17	44.	Right.
300		it started. And Gary, he took me straight to	18	0.	and said because he's Gary, and said, you
18	^	Scott Reed.	19	۷.	don't want to work with anybody?
19	Q.	Okay.	20	A.	
20		COURT REPORTER: He took what?	21	А.	(In English without translation of question)
21		THE WITNESS: He took me.	120000	_	Uh-huh.
22		I can say he went to report to me to Scott	22	Q.	And then you said, what, am I supposed to be here
23		Reed that can't do job, I'm lazy, so Juan is	23		to touch men's penises?
24		he got his powerful so that's why we got to fight	24		(In English without translation of question)
25		with Juan because I'm lazy, I can't do job.	25		Right.

1 Q. 2 3 4 A.	And then he and then did Gary think you had touched his penis or did he know that you were	1		139 like, oh, you don't want to get along with the
2 3		1		like oh you don't want to get along with the
3	touched his penis or did he know that you were			
		2		people, don't you? And that's why I said, do you
4 n	saying Juan had asked you to do that?	3		think I'm here to touch men's penis, and he's
7 A.	(In English without translation of question)	4		like, whoa, whoa, whoa, oh, that's why you going?
5	He think I was lying.	5		I know how I will get you.
6 Q.	He thought you were lying?	6	Q.	He said that's where you're you're going?
7 A.	(In English without translation of question)	7	A.	(In English without translation of question)
8	Yeah.	8		Yeah.
9 Q.	How do you know?	9	Q.	I know how I'll get you?
10 A.	(In English without translation of question)	10	A.	(In English without translation of question)
11	Because he said, he told me, oh, you	11		Yeah.
12	don't you don't want to get along with the	12	Q.	That's what he said?
13	people, don't you	13	A.	(In English without translation of question)
14 Q.	Uh-huh.	14		Yeah.
15 A.	I know how I would get you and he called me to	15	Q.	Did you tell him Juan had made the gesture to
16	office right away.	16		you?
17 Q.	All right. And when he said this to you, was	17	A.	(In English without translation of question)
18	anybody else present?	18	×	Yes.
19 A.	(In English without translation of question)	19	Q.	When did you tell him that?
20	Everybody that was on the line. And we was	20	A.	(In English without translation of question).
21	between the Great Bend line and the Hand line.	21		On that same day he come back on Monday.
22	COURT REPORTER: The what?	22	Q.	On when you were talking to Gary between the
23	MS. CALEM: Great Bend.	23		Great Bend line and the Hand line, did you tell
24	THE INTERPRETER: Great Bend.	24		him then, no, he pointed at his penis? Did you
25	BY MS. CALEM:	25		say it then?
	138			140
1 Q.	Between the Great Bend line and the Hand line?	1	A.	(In English without translation of question)
2 A.	(In English without translation of question)	2		Yes.
3	Yes.	3	Q.	Okay. And then he said, I'm going to get you?
4 Q.	Okay. And so you you think that people just	4	A.	(In English without translation of question)
5	overheard him?	5		Yes.
6 A.	(In English without translation of question)	6	Q.	And then you went to his office with him, or did
7	I don't know if anybody heard him.	7		he take you to HR?
8 Q.	Okay.	8	A.	(In English without translation of question)
9 A.	I can't testify that somebody heard it but it was	9		He told Lisa to come to call me in the
10	between me and him, and my attention was on him	10		office.
11	to understand me and give me my right.	11	Q.	He told Lisa Christion to call you to which
12 Q.	Okay. And he said he when you told him, am I	12		office?
13	supposed to be here to touch men's penises, did	13	A.	(In English without translation of question)
14	you tell him that Juan had asked you to do that?	14		His office.
15 A.	(In English without translation of question)	15	Q.	Gary's office?
16	Because he asked me why you can't work with	16	A.	(In English without translation of question)
17	Juan, and I said that once he told me to do, I	17		Right.
18	didn't like and I don't want to work with the	18	Q.	Okay. And how do you know he told Lisa to call
19	him. I don't feel comfortable to work with the	19		you to the office?
20	him. And he said, Oh, oh, oh, oh, you don't want	20	A.	(In English without translation of question)
21	to get along with the people, don't you? So I	21		Because Lisa come to call and said they need
22	feel like why don't he want to understand and I	22		you in the office.
23	don't want to tell him because I was, like, I'm	23	Q.	Okay. So didn't Gary talk to Juan and ask him,
24	going not to sue him for that but let me just	24		did you do this?
25	let me just leave and I can do my job. So he's,	25	A.	(In English without translation of question)
17 18 19 20 21	Because he asked me why you can't work with Juan, and I said that once he told me to do, I didn't like and I don't want to work with the him. I don't feel comfortable to work with the him. And he said, Oh, oh, oh, oh, you don't want to get along with the people, don't you? So I feel like why don't he want to understand and I	17 18 19 20 21 22	Q. A.	Right. Okay. And how do you know he told Lisa to call you to the office? (In English without translation of question) Because Lisa come to call and said they need you in the office.

		mithitela roods, inc.	T		4.47
		145	4	_	147
1		Possibly. It wasn't, like, pour water, the	1	Q.	At that point in time, did Scott offer you to
2		pour water. It was the blue bucket we put on top	2	_	move to another department?
3		of table, so when it when it because that	3	Α.	I'm sorry, excuse me.
4		job, they have to wash hands and put a net, but	4		(Sotto voce discussion between witness and
5		if it was almost finish and it's cold, they had	5		interpreter.)
6		to go in and to pour water again and put the	6		THE INTERPRETER: She's feeling bad about me
7		fresh water so that's the bucket, it came	7		not speaking. I'm, like, it's okay.
8		because I was taking a clip tip and put to the	8		BY MS. CALEM:
9		other side, so he didn't say excuse me. He just	9	Q.	No, it's okay. I think we're working fine. I
10		go he just come with the bucket, threw to my	10		understand you, and if we need some help, we have
11		right leg. But I didn't say anything but	11		Elias here.
12		Kamesu you know, a lot of people, they they	12		THE INTERPRETER: What was the question
13		scared to tell the truth in personnel office	13		again?
14	(0.44)	because they don't want to be hate from	14		BY MS. CALEM:
15		supervisor or another employees or personnel	15	Q.	The question is at that time, did Scott Reed
16		office, okay. They're scared. They don't want	16		offer that you go to into another department?
17		to tell the truth, but that's the truth it was.	17	A.	He asked me if I want to switch, go to a
18	Q.	Okay. Well, I understand what you're saying, but	18		different department on the 20. I told him, no,
19		all the personnel office can do is ask people,	19		I love my department. I will stay there and I
20		right? I mean, they	20		love my job there.
21	A.	(In English without translation of question)	21		BY MS. CALEM:
22		They can ask people.	22	Q.	Okay. So there's nothing that I see in the notes
23	Q.	they don't know what's true, what's not,	23		that say that you're supposed to always work
24	κ.	they're asking people, right?	24		separately from Juan, and you're saying that
	Α.	(In English without translation of question)	25		Scott Reed told you that?
		146			148
1		I don't know.	1	Α.	(In English without translation of question)
2	Q.	So there all this investigation happened and	2		Yes.
3	۷.	then there was a meeting that the notes, anyway,	3	Q.	And who else was present when he said that?
4					
5			- 5		
10	71	say there was a meeting with you and Ian Strum -	4	A.	(In English without translation of question)
l 6	Α.	say there was a meeting with you and Ian Strum Okay.	4 5	A.	(In English without translation of question) Strum.
6	A. Q.	okay. and Juan and Dave Hillberg and went over the	4 5 6	A. Q.	(In English without translation of question) Strum. Ian Strum?
7		okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you	4 5 6 7	A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question)
7 8		say there was a meeting with you and Ian Strum Okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody	4 5 6 7 8	А. Q. А.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes.
7 8 9		okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying	4 5 6 7 8 9	A. Q. A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else?
7 8 9 10		okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would	4 5 6 7 8 9	А. Q. А.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question)
7 8 9 10 11	Q.	okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again?	4 5 6 7 8 9 10	A. Q. A.	<pre>(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the</pre>
7 8 9 10 11 12	Q.	say there was a meeting with you and Ian Strum — Okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question)	4 5 6 7 8 9 10 11 12	A. Q. A. Q. A.	<pre>(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office.</pre>
7 8 9 10 11 12 13	Q.	okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to	4 5 6 7 8 9 10 11 12 13	A. Q. A.	<pre>(In English without translation of question)</pre>
7 8 9 10 11 12 13 14	Q.	say there was a meeting with you and Ian Strum — Okay. — and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same	4 5 6 7 8 9 10 11 12 13 14	Q. A. Q. A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there?
7 8 9 10 11 12 13 14 15	Q.	okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again.	4 5 6 7 8 9 10 11 12 13 14 15	A. Q. A. Q. A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question)
7 8 9 10 11 12 13 14 15 16	Q.	say there was a meeting with you and Ian Strum — Okay. — and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same	4 5 6 7 8 9 10 11 12 13 14 15 16	A.Q.A.Q.A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes.
7 8 9 10 11 12 13 14 15 16 17	Q.	okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again. So you're saying Scott Reed said we're nev you guys are going to work on different lines and you	4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A. Q. A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes. Okay. Because the notes from human resources say
7 8 9 10 11 12 13 14 15 16 17	Q. Α.	say there was a meeting with you and Ian Strum — Okay. — and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again. So you're saying Scott Reed said we're nev — you guys are going to work on different lines and you never work together again?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A.Q.A.Q.A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes. Okay. Because the notes from human resources say we reviewed the following expectations with both
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7 8 9 10 11 12 13 14 15 16 17 18	Q. Α.	Say there was a meeting with you and Ian Strum—Okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again. So you're saying Scott Reed said we're nev — you guys are going to work on different lines and you never work together again? (In English without translation of question)	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A.Q.A.Q.A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes. Okay. Because the notes from human resources say we reviewed the following expectations with both employees. Expect all employees to treat each
7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q.	say there was a meeting with you and Ian Strum — Okay. — and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again. So you're saying Scott Reed said we're nev — you guys are going to work on different lines and you never work together again? (In English without translation of question) Him and a union representative.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A.Q.A.Q.A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes. Okay. Because the notes from human resources say we reviewed the following expectations with both employees. Expect all employees to treat each other with respect. They need to work together
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q.	say there was a meeting with you and Ian Strum—Okay. — and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again. So you're saying Scott Reed said we're nev — you guys are going to work on different lines and you never work together again? (In English without translation of question) Him and a union representative. Did anybody write this down?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A.Q.A.Q.A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes. Okay. Because the notes from human resources say we reviewed the following expectations with both employees. Expect all employees to treat each other with respect. They need to work together to get the job done. If concerns arise, they
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A.	Say there was a meeting with you and Ian Strum—Okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again. So you're saying Scott Reed said we're nev — you guys are going to work on different lines and you never work together again? (In English without translation of question) Him and a union representative. Did anybody write this down? (In English without translation of question)	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A.Q.A.Q.A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes. Okay. Because the notes from human resources say we reviewed the following expectations with both employees. Expect all employees to treat each other with respect. They need to work together to get the job done. If concerns arise, they need to immediately bring the concern to their
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q. A.	say there was a meeting with you and Ian Strum Okay. and Juan and Dave Hillberg and went over the whole situation. And there was a talk about, you know, you have to behave appropriately, everybody has to act respectfully. And are you saying there was an agreement that you and Juan would never have to work together again? (In English without translation of question) Scott Reed, he said that we going to separate you. From now, you can't work the same line again. So you're saying Scott Reed said we're nev you guys are going to work on different lines and you never work together again? (In English without translation of question) Him and a union representative. Did anybody write this down? (In English without translation of question) I don't know. I wasn't have a pen. They,	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A.Q.A.Q.A.	(In English without translation of question) Strum. Ian Strum? (In English without translation of question) Yes. Anybody else? (In English without translation of question) Juan, David, like, where we was in the office. Okay. Juan, David, Ian, Scott, Sala. Was Carrie Moate there? (In English without translation of question) Yes. Okay. Because the notes from human resources say we reviewed the following expectations with both employees. Expect all employees to treat each other with respect. They need to work together to get the job done. If concerns arise, they need to immediately bring the concern to their lead or supervisor. Do you remember that being

		149			151
1		The thing he told me, he said you have to go	1		himself and I myself. No hi's, no nothing.
2		back to work, but if you all bring another issues	2	Q.	So no other touching, no other gestures, nothing?
3		between you two, I am going to fire both of you.	3	A.	(In English without translation of question).
4		That's what he said.	4		No.
5	Q.	Scott Reed said that?	5	Q.	Okay. And to be clear, Scott [sic] did not touch
6	A.	(In English without translation of question)	6	155	you or say anything to you verbally. He made the
7		Yes. He told me that.	7		gesture; is that right?
8	Q.	In this same meeting?	8	Α.	(In English without translation of question).
9	A.	(In English without translation of question)	9		Yes. Scott or Juan?
10		Yes.	10	Q.	I'm sorry, Juan. I'm getting the people
11	Q.	Okay. You didn't mention that before. So what	11		confused. Sorry.
12	-	my question was, do you remember the anybody	12	Α.	(In English without translation of question)
13		saying at that meeting the two of you need to	13		That's all right.
14		work together to get the job done?	14		Excuse me, can I ask you a question?
15	Α.	(In English without translation of question)	15	Q.	Nope.
16		No.	16	A.	(In English without translation).
17	Q.	Do you remember Juan saying that he did not want	17		Let me say something. Because you say in
18	Σ.	to work with you now, he was concerned about	18		the that during that meeting, nobody said
19	Œ.	working with you?	19		we're not supposed to work each other, nobody
20	A.	(In English without translation of question)	20		have that testimony. I can show that testimony I
21	Α.	He said he don't want to work with me.	21		have about myself.
22	Q.	Juan said that?	22	Q.	What do you mean?
23	A.	(In English without translation of question)	23	A.	(In English without translation of question)
24	А.	Yeah, he don't want to work with me again.	24		I mean, I have a recording when I went to
25	0	And do you remember Scott saying to him, look,	25		unit when April 4, in April 4, 2014, when Scott
	Ε'	150			152
.					
1 1		you need to move on?	1		Reed, he demanded me to work with the Juan again,
1 2	Α.	you need to move on? (In English without translation of question)	1 2		Reed, he demanded me to work with the Juan again, I was mad and upset and I went into Strum and
2	A.	(In English without translation of question)	1527		Security Card Control Control Control Control Card Contro
2		(In English without translation of question) I don't I'm not remember that.	2		I was mad and upset and I went into Strum and
2 3 4	Α .	(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you	2		I was mad and upset and I went into Strum and asked him and I recorded him and I have his
2		(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with	2 3 4		I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what
2 3 4 5 6	Q.	(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again?	2 3 4 5		I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make they he said didn't they make an
2 3 4 5 6 7		(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question)	2 3 4 5 6	Q.	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make — they — he said didn't they make an agreement on the paper but they make the
2 3 4 5 6 7 8	Q.	<pre>(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question) Exactly. And everybody in that department,</pre>	2 3 4 5 6 7	Q. A.	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make — they — he said didn't they make an agreement on the paper but they make the agreement, he remember.
2 3 4 5 6 7 8 9	Q.	<pre>(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question) Exactly. And everybody in that department, they know that. Even Gary when and Lisa, when</pre>	2 3 4 5 6 7 8	100-200	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make they he said didn't they make an agreement on the paper but they make the agreement, he remember. This is Ian Strum told you this?
2 3 4 5 6 7 8 9	Q.	<pre>(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question) Exactly. And everybody in that department,</pre>	2 3 4 5 6 7 8 9	100-200	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make they he said didn't they make an agreement on the paper but they make the agreement, he remember. This is Ian Strum told you this? (In English without translation of question)
2 3 4 5 6 7 8 9 10	Q.	(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question) Exactly. And everybody in that department, they know that. Even Gary when and Lisa, when they say that, I'm close to net place, they will make me embarrassed and kick me out of there.	2 3 4 5 6 7 8 9	A.	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make they he said didn't they make an agreement on the paper but they make the agreement, he remember. This is Ian Strum told you this? (In English without translation of question) Yes. And I have a recording.
2 3 4 5 6 7 8 9 10 11	Q.	(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question) Exactly. And everybody in that department, they know that. Even Gary when and Lisa, when they say that, I'm close to net place, they will make me embarrassed and kick me out of there. They told me, you're not supposed to be you're	2 3 4 5 6 7 8 9 10	A.	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make they he said didn't they make an agreement on the paper but they make the agreement, he remember. This is Ian Strum told you this? (In English without translation of question) Yes. And I have a recording. Okay. Well, that is certainly something we
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. A.	(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question) Exactly. And everybody in that department, they know that. Even Gary when and Lisa, when they say that, I'm close to net place, they will make me embarrassed and kick me out of there. They told me, you're not supposed to be you're not supposed to put even your feet in this area. Over there, that's your area. You can't come here. Everyone know that. Which area did they say you could not go in? (In English without translation of question). Great Bend line? (In English without translation of question).	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q.	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make — they — he said didn't they make an agreement on the paper but they make the agreement, he remember. This is Ian Strum told you this? (In English without translation of question) Yes. And I have a recording. Okay. Well, that is certainly something we should have had already. MS. POCHOP: I don't have it, either. THE WITNESS: I sent to you, Stephanie. I sent to Marty? I give to her. Okay. So this is not a recording not from 2014 but in 2016 when you're talking to Ian, right? (In English without translation of question) Right. When he said — he said that I had to start to work with the Juan after mediation and everything so that's how I said they start
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A.	(In English without translation of question) I don't I'm not remember that. So when you left that meeting, you thought you were never supposed to be on the same line with Juan again? (In English without translation of question) Exactly. And everybody in that department, they know that. Even Gary when and Lisa, when they say that, I'm close to net place, they will make me embarrassed and kick me out of there. They told me, you're not supposed to be you're not supposed to put even your feet in this area. Over there, that's your area. You can't come here. Everyone know that. Which area did they say you could not go in? (In English without translation of question). Great Bend line? (In English without translation of question). Yeah. Okay. And after this incident in 2014, did Juan	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q.	I was mad and upset and I went into Strum and asked him and I recorded him and I have his recording. You can listen to what he said, what they make — they — he said didn't they make an agreement on the paper but they make the agreement, he remember. This is Ian Strum told you this? (In English without translation of question) Yes. And I have a recording. Okay. Well, that is certainly something we should have had already. MS. POCHOP: I don't have it, either. THE WITNESS: I sent to you, Stephanie. I sent to Marty? I give to her. Okay. So this is not a recording not from 2014 but in 2016 when you're talking to Ian, right? (In English without translation of question) Right. When he said — he said that I had to start to work with the Juan after mediation and everything so that's how I said they start harassing me, retal — retaliation against me

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Veri		153			155
1	Q.	Okay. And then you talked to Ian and said,	1	A.	(In English without translation of question)
2		didn't we have an agreement, and Ian said, yes,	2		Asking him.
3		we had an agreement. That's what Ian told you?	3	Q.	And you're asking him, isn't it true that I
4	A.	(In English without translation of question)	4		didn't have to work with Juan anymore?
5	, in	Ian, he said they didn't put on the note,	5	A.	(In English without translation of question)
6.		but if you want, you can listen to that voice	6		Right.
7		message. I don't have to tell you in my mouth.	7	Q.	And Ian says, yes, that's right?
8		You can listen for yourself if you want to.	8	A.	(In English without translation of question)
9	Q.	Well, I'm not going to listen to it right here	9		When Can you listen yourself?
10		and now. Are you saying you have it here with	10	Q.	No. I'm not going to listen right now.
11		you?	11		MS. POCHOP: Sala, just answer her question.
12	A.	(In English without translation of question)	12		She's asking you to tell her because she doesn't
13		Yes.	13		have the recording so just tell her what you know
14	Q.	But so but I want you to describe for me what	14		about it, okay?
15		it is you're talking about. It's a voicemail	15		THE WITNESS: Okay.
16		from Ian to you, or a recording you made?	16		BY MS. CALEM:
17	A.	(In English without translation of question)	17	Q.	Right. The way things work is that usually I get
18		A recording.	18		all the information, the documents, everything
19	Q.	A recording of you and Ian talking?	19		first and then I'm able to talk to you about it,
20	A.	(In English without translation of question)	20		but I don't have that so I want you to tell me.
21		Yeah, because everything, even I have a	21		It's just the two of you, you and Ian,
22		witness, even I have a right, I never have a	22		right?
23		right in that office. So when I went to asking	23	A.	(In English without translation of question)
24		him, because I know that we said it inside the	24		Okay.
25		office in that meeting. I know. I had to record	25	Q.	Right?
		154			156
1		him so because he knew we he did say that, I	1	A.	(In English without translation of question)
2		can't work with the Juan on the same line.	2		Right.
3		That's why I record him.	3	Q.	Okay. And you you asked him, is it didn't
4	Q.	Did Ian know that you were recording him?	4		we have an agreement that I would never have to
5	A.	(In English without translation of question).	5		work with Juan, right?
6		I don't know.	6	A.	(In English without translation of question)
7	Q.	Did you tell him?	7		I asking him, yeah, that I'm supposed to
8	A.	(In English without translation of question)	8		work with Juan or not? And he said, no, you're
9		I didn't tell him. Why am I supposed to	9		not supposed to work with the Juan because I
10		tell him?	10		remember that's how he saying in his English, I
11	Q.	Where were you speaking to Ian when you made the	11		remember we have an agreement, me and Scott Reed,
12		recording?	12		that you can't work with the Juan anymore. So I
200000	Α.	(In English without translation of question)	13		don't know what is going on in that office.
14		In personnel office oh, union office.	14		That's what he say.
15	Q.	In the union office?	15	Q.	Okay. And did Ian speak to Scott Reed to tell
16	Α.	(In English without translation of question)	16		him that?
17		Uh-huh.	17	A.	(In English without translation of question)
18		And what day was this?	18		Who?
1	Q.	And what day was chis.			
19	Q. A.	(In English without translation of question)	19	Q.	Do you know if Ian then went and spoke to Scott
19 20	1000		19 20	Q.	Reed and said, what are you doing, we have an
20	A.	(In English without translation of question)		Q.	
20 21	1000	(In English without translation of question) April 4, 2016.	20	Q.	Reed and said, what are you doing, we have an
20	A. Q.	(In English without translation of question) April 4, 2016. 2016?	20 21		Reed and said, what are you doing, we have an agreement?
20 21 22 23	А. Q. А.	(In English without translation of question) April 4, 2016. 2016? (In English without translation of question) Uh-huh.	20 21 22		Reed and said, what are you doing, we have an agreement? (In English without translation of question)
20 21 22	A. Q.	(In English without translation of question) April 4, 2016. 2016? (In English without translation of question)	20 21 22 23		Reed and said, what are you doing, we have an agreement? (In English without translation of question) I don't know if he speak with him, but he

10 Okay. How long were you speaking to law for when you made the recording? 2 A. (In Regish without translation of question) 4 I sever watch what time after work. 5 O. Just estimate. Bulf hour, an hour, ten shoules? 6 A. (In Regish without translation of question) 7 Maybe 20, I guess. I don't know what time is tews. 9 O. Okay. All right. And must happened after their, all tests to Societ or supposed to talk to Societ Societ. 12 A. (In Regish without translation of question) 13 More I'm supposed to talk to Societ Societ. 14 A. They shall me shall me shall be society Societ. 15 Society Society Society. 16 A. They shall me shall me shall be society Society. 17 And society society society. 18 O. Okay. Multimod translation of question) 18 O. Okay. Multimod translation of question processes and the society society. 19 Works on the same line with Just Time that you work with him. 20 O. Okay. Multimod translation of question processes with supposed to talk to Society Society. 19 Works on the same line with Just Time that you work with him. 20 No. Okay. Multimod translation of question processes with supposed to talk to Society Society. 21 Society Society Society. 22 O. Cash. The day had you lost to work with him. 23 Society Registry Society. 24 A. (The Regish without translation of question) 25 A. (The Regish without translation of question) 26 Society Registry Society. 27 Society Registry Society. 28 A. (The Regish without translation of question) 29 C. Obey. And did you go work on the Society Society. 20 C. The Without translation of question processes with supposed to work with him. 20 Society Registry Society. 21 Society Registry Society Society. 22 Society Registry Society. 23 A. (The Regists without translation of question) 24 Society. And did you go work on the Society Society. 25 A. The Without translation of question processes with supposed to work with him. 26 Society. Registry Society. 27 Society. Registry Society. 28 Society. Registry Society. 29 Control registry Societ			midiliela 100as, inc.	T		1103 117 11010
3 A. (In English without translation of question) 4 Invervements what time after work. 5 Q. Outs outlands. Helf hour, an hour, ten similar? 6 A. (In English without translation of question) 7 Maybe 20, I queez. I don't know what time 8 to way. 9 Q. Outs, All right. And what happened after that, 10 attree is noted you that? Hild you go back add 11 that to Room or anypose? 112 A. (In English without translation of question) 13 Bor Transpose hours of the life of the work of the sense bailed by his decided to complain about it. 14 he sent bailed by a feet to work with the amount of the sense bailed by his decided by his we to work with the amount of the sense bailed by his decided by his we to work with the amount of the sense bailed by his decide of the sense life at July 20 A. (In English without translation of question) 17 hours a obstee. 18 his decided by his decide of question and called the sense bailed by his decide of the sense life at July 20 A. (In English without translation of question) 18 hours on the sense life at July 20 A. (In English without translation of question) 19 A. (In English without translation of question) 10 A. (In English without translation of question) 10 A. (In English without translation of question) 11 A. (In English without translation of question) 12 A. (In English without translation of question) 13 A. (In English without translation of question) 14 Carry. 15 A. (In English without translation of question) 15 A. (In English without translation of question) 16 Carry. 17 Maybe and day on your ton the Soney line. 18 Y. M. CALEM: 18 On the Enew, Yall. 19 A. (In English without translation of question) 19 A. (In English without translation of question) 10 A. (In English without translation of question) 11 A. (In English without translation of question) 12 I mean, yawh. 13 A. (In English without translation of question) 14 A. (In English without translation of question) 15 A. (In English without translation of question) 16 A. (In English without translation of question) 17 T mean, yaw			157	2004		W AC D MODERN MA
3 A. (In English without translation of question) 4 I never watch what time after work. 5 Q. dust estimate. Held hour, an hour, ten minutes? 5 Q. dust estimate. Held hour, an hour, ten minutes? 5 A. (In English without translation of question) 7 Maybe 20, 1 goars. I don't know what time 8 It was. 8 Q. obay. All civilit. And what hippened after hot. 10 after isn told you this? Did you up back and 11 acik to Beats or enyogo? 11 A. (In English without translation of question) 12 A. (In English without translation of question) 13 Mor I'm apposed to talk to Beats? Beats. 15 office, bell-me. Mais. No makes what. Beat has desided you have to work with the duan, you don't feel the grant of a numb? 15 office, bell-me. Mais. No makes what. Beat has desided you have to work with the duan, you don't feel the grant of a numb? 16 desided you have to work with the duan, you don't feel the grant of a numb? 17 have a choice. 18 Q. obay. Not then in April, who manipored to soil to soil to some limit of the duan in the duan of the duan in the soil of th	1	Q.	Okay. How long were you speaking to Ian for when	1		same line with Juan before March 2nd, 2016?
Finewar watch what time after work. 5 Q. Just welloade. Tail how, an hour, ten minutes? 6 A. (In Regish without translation of question) 7 Maybe 20, I guess. I don't know what time 8 it ws. 9 Q. Chay. All right. And what happened after that, 10 after lan card you think use you go bark and 11 taik to don't or anybody? 12 A. (In Regish without translation of question) 13 Mor I'm suppeared to taik to decit yeart. 14 he sent David in the office and called main the 15 decided you have to work with the uman you don't 16 decided you have to work with the uman you don't 17 have a choice. 18 Q. Oxy. And then in Early, who assigned you to 19 work on the case line as uman? 20 A. (In Regish without translation of question) 21 Mag? 22 Q. Youk. The away cand to work with than, 22 D. Youk. The away cand to work with than, 23 ther, you know, you mad I'm and unpoined to work 24 with him was assigned you to work with him. 25 A. (In Regish without translation of question) 16 Gary. 27 Q. The Great Bend Line? 18 Gary. 19 A. (In Regish without translation of question) 19 A. (In Regish without translation of question) 10 A. (In Regish without translation of question) 11 Gary. 22 O. On the Great Bend Line? 23 (Sotto wore discussion between witness and 16 Mag. CALDES: Govern Jime. 17 A. (In Regish without translation of question) 18 THE WINTERS: Borey Line. 19 C. Oxy. And they would not work with him with 10 him? 11 A. (In Regish without translation of question) 12 I man, yeah. 13 A. (In Regish without translation of question) 14 A. (In Regish without translation of question) 15 A. They autohing. They took him off on his pob. 16 COUNT BETWEENER: Say the line egain. 17 A. They autohing. They took him off on his pob. 18 A. They autohing. They took him of on his pob. 19 P. M. CALDES: 10 A. (In Regish without translation of question) 11 A. They autohing. They took him of on his pob. 12 A. They autohing. They took him of on his pob. 13 A. In March I was Gary. 24 C. Oxy. And did you go work o	2		you made the recording?	2	A.	(In English without translation of question)
5 Q. Cast estimate. Naif hour, ten minutes? 6 A. (In Regilah without translation of question) 7 Pempho 20, I quest know that time 8 it was. 8 Q. Oaky. All right. And what happened sizer that. 10 after ism columns that his provided sizer that. 11 Lank to mooth or anybody? 12 A. (In Regilah without translation of question) 13 Mow Ten supposed to talk to Scotty Scott, 14 he and bayd in the office and calculate in the base of the office and calculate in the base of the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the office and calculate in the base of the same time to accompany the same time time time. 15	3	A.	(In English without translation of question)	3		Yes.
6 A. (In English without translation of question) 7	4		I never watch what time after work.	4	Q.	Okay. So you'd worked with him several times
## Accordance Ac	5	Q.	Just estimate. Half hour, an hour, ten minutes?	5		already, right?
Solution	6	A.	(In English without translation of question)	6	A.	That's why that's why I complain about it
9 Q. Okay, All right. And what happened after that, 10 atter I to Cotto or anybody? 11 A. (In Reglish without translation of question) 13 Now I mapposed to teak to scotty scott, 14 he send David in the office and called me in the 15 office, tell me, Sale, no matter what, Scott has 16 decided you have to work with the Juan, you don't 17 have a choice. 17 have a choice. 18 Q. Okay, And then in April, who assigned you to 18 Q. Okay, And then in April, who assigned you to 19 work on the same line as Jeas? 20 A. (In Reglish without translation of question) 21 Where 22 Q. Veath, The day that you had to work with his, 23 that, you know, you said I'm not supposed to work 24 with his, who assigned you to work with min. 25 A. (In Reglish without translation of question) 26 Gary. 27 A. (In Reglish without translation of question) 28 Gary. 29 On the Great Bend line? 30 A. (In Reglish without translation of question) 31 A. (In Reglish without translation of question) 42 Work his, who assigned you to work with Juan? 43 A. (In Reglish without translation of question) 44 No. On the Bendey line. 55 COURT REPORTER: Say the line again. 66 THE WITHERS: Honey line. 67 MS. CALEM: Honey line. 68 A. (In Reglish without translation of question) 69 Q. Okay, And did you go work on the Honey line with 60 his? 61 They withdrift the subject on his place, on 61 The subject of the	7		Maybe 20, I guess. I don't know what time	7		because I was told not to work anymore with Juan,
10 area and cold you think fold you go back and 11 tail to cock or anybody? 12 A. (In English without translation of question) 13	8		it was.	8		but he was there so it got me uncomfortable and I
11 A. (On English without translation of question) 12 A. (On English without translation of question) 13	9	Q.	Okay. All right. And what happened after that,	9		decided to complain about it.
12 A. Cin English without translation of question 12 A. Like, three times. 13 C. And when was the first time that you worked with 14 Discontinuous process of the same line and called me in the 14 Discontinuous process 15 A. To January and 16 Tit. WITNESS: No. Hold on. 17 Gootto vocce discussion between witness and Interpretor.) 18 Interpretor. 18 C. Continuous process C. Contin	10		after Ian told you this? Did you go back and	10	Q.	Okay. How many times before March 2nd had you
How I'm supposed to talk to Scott? Scott, 14 he sent David in the office and called me in the 15 office, tell me, sais, ne matter what, Scott has 16 decided you have to work with the Juan, you don't 17 have a choice. 18 Q. Oxay, and then in April, who assigned you to 18 let a choice. 19 work on the same line as Juan? 20 A. (In English without translation of question) 21 work on the same line as Juan? 22 Q. Yeach, The day that you had to work with him, 23 that, you know, you said I'm net supposed to work 24 with him, who assigned you to work with Juan? 25 A. (In English without translation of question) 158 16 Gary. 1 MS. CALEM: Pobruary and March. 27 THE MITHESS: Mo. Hold on. 18 W. CALEM: Pobruary and March? 28 THE MITHESS: Mo. Work with Juan? 29 O. Ox the Great Bend Line? 20 On the Great Bend Line? 30 A. (In English without translation of question) 4 No. On the Boney Line. 5 COURT REPORTER: Say the Line again. 6 THE WITHESS: Money Line. 8 MY MS. CALEM: Honey Line. 9 O. Oxey, And did you go work on the Honey line with 10 him? 11 A. (In English without translation of question) 12 I mean, yeah. 13 (Sotto voce discussion between witness and 14 interpreter.) 15 A. They witching They took him off on his job. 16 regular job, and they brought him to me where I 17 was and thay put cemeone size on his place, on 18 he lame. 19 NY MS. CALEM: 19 NA I ddn't work with him to	11		talk to Scott or anybody?	11		worked on the same line with Juan?
13 Now I'm supposed to talk to Scott? Scott. 13 Q. And when was the first time that you worked with 14 him on the same line in 2018? 15 office, bell me, Sais, no matter what, Scott has 16 decided you have to work with the Juan, you don't 16 THE NITHESSE NO. Sold on. 17 (Souto work discussion between witness and interpreted.) 18 interpreted. 19 work on the same line as Juan? 20 Q. In February 21 Who assigned you to work with him. 22 With him, who assigned you to work with him. 22 Q. Yeah. The day that you had to work with him. 22 With him, who assigned you to work with Juan? 24 With him, who assigned you to work with Juan? 25 A. (In English without translation of question) 26 A. (Souto wore discussion between witness and interpreter.) 3 A. (In English without translation of question) 3 W. S. CALEM: February and March. 25 A. (In English without translation of question) 3 W. S. CALEM: February and March. 4 Q. (Asy. And do you remember what days in Pebruary and March Record	12	Α.	(In English without translation of question)	12	A.	Like, three times.
14 he sent David in the office and called me in the office, tell me, Sala, no matter what, Scott has officed you have to work with the Juan, you don't have a choice. 17 have a choice. 18 Q. Okay. And then in April, who assigned you to perfect the sent of t	13			13	Q.	And when was the first time that you worked with
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17 Nave a choice. 18 Q. Okay. And then in April, who assigned you to 18 Interpretor;) 19 Mork on the same line as Juan? 20 A. (Gn English without translation of question) 21 Who? 22 Yeah. The day that you had to work with him, 22 Ch-Huh. March	12000					
18 Q. Okay. And then in April, who assigned you to 19 work on the same line as Jum? 20 A. (Gn English without translation of question) 21 Whö? 22 Q. Yeah. The day that you had to work with him. 23 that, you know, you said I'm not supposed to work 24 with him, who assigned you to work with Jumn? 25 A. (Gn English without translation of question) 26 A. (Gn English without translation of question) 27 A. (The English without translation of question) 28 Jumple Provided Head of the Work with Jumn? 29 A. (Gn English without translation of question) 20 Jumple Provided Head of the Work with Jumn? 21 Jumple Provided Head of the Work with Jumn? 22 Jumple Provided Head of the Work with Jumple Head of the Work with Him January 23 A. (Gn English without translation of question) 24 While Albert Head of the Work with Him January 25 A. (Gn English without translation of question) 26 Jumple Provided Head of the Work with him? 27 Jumple Provided Head of the Work with him? 28 Jumple Provided Head of the Work with Him January 29 Q. Okay. And did you go work on the Honey line with 30 Jumple Provided Head of the Work with him January 39 Q. Okay. And did you go work on the Honey line with 30 Jumple Provided Head of the Work with him January 30 Jumple Provided Head of the Work with him January 31 A. (Gn English without translation of question) 30 Jumple Provided Head of the Work with him January 30 Jumple Provided Head of the Work with him January 30 Jumple Provided Head of the Work with him January 31 A. (Gn English without translation of question) 31 Jumple Provided Head of the Work with him Jumple Provided Head of the Work with Jumple Head of the Work work with Jumple Head of the Work work with Jumple Head of the Work with Jumple Head of	1			100000000000000000000000000000000000000		
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1		they did it on purpose, because if I go said it	1		Yes, because they lied to me something I
2		again, it would look like I'm bringing chaos in	2		never done in the in the department, and they
3		the company so I decided not to.	3		said, whatever this says, you have to be taken a
4	Q.	Do you have any other recordings besides this one	4		picture because something's not real. They said
5		with Ian?	5		that I'm the one who doing, and she told me, they
6	A.	No.	6		said, you're not telling the truth, you have to
7	Q.	Is there anything else you have in your	7		take a picture and that's why I'm taking a
8		possession that relates to this lawsuit that you	8		picture.
9		haven't given us?	9	Q.	Even though it's against the company rules to
10	A.	There was some pictures that I sent to my lawyer	10		take pictures on the production floor?
11		from the picture that you shown yesterday, there	11	A.	I don't know if it is written in a book, but I
12		was two more missing that I think was supposed to	12		seen other people taking pictures.
13		be on it.	13	Q.	You've seen the handbook where it says you're not
14	Q.	What were they pictures of?	14		allowed to take pictures, right?
15	A.	It was a picture of me working alone by myself	15	A.	I'm sorry, I haven't seen it, but if you can show
16		while the other employees, other coworkers was	16		me, that would be perfect.
17		supposed to be there with me, while they were	17	Q.	I can certainly show it to you. Okay. So
18	Đ.	taken someplace else.	18		when going back to this discussion in 2014
19		THE WITNESS: Wait. (Speaking Swahili).	19		about you and Juan, I just want to clarify. At
20	A.	We were three people working on a vat and then	20		that time, Scott offered you the opportunity to
21		they came, take two people out of there and they	21		move to a different department where Juan would
22		left me alone right there.	22		not work; is that right?
23		THE WITNESS: (Speaking Swahili).	23	A.	Yes, it is true.
24	A.	And they took them on the other place where there	24	Q.	Okay. And normally you have to have a lot of
25		were three more people, including two of them,	25		seniority to pick another department; is that
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1		there were five, but the job was supposed to be	1		right?
2		doing by two people.	2	A.	He didn't tell me to pick which department I
3		THE WITNESS: (In English) Three.	3		should go. He just said he just asked me if I
4	A.	I mean three people instead of five.	4		would like to switch or to go to different
5	Q.	Who took these pictures?	5		department.
6	A.	Myself.	6	Q.	Right. And normally when you switch to a
7	Q.	You took the pictures of you on the line	7		different department Well, strike that. Okay.
8	225	yourself?	8		So in February when Russ assigned you to work
9	A.	Yes.	9		with Juan, was that before or after the Scott
10	Q.	Okay. And when did you take these pictures?	10		Genzler incident?
11	A.	I can't tell you a date, but if you look on	11		THE INTERPRETER: (Translating) Genz
12		look on when the picture was taken.	12		Scott?
13	Q.	Do you remember what year it was?	13		MS. CALEM: Scott Genzler.
14	A.	This this year of 2017.	14	A.	He was the whole thing started happening after
15		(Sotto voce discussion between witness and	15		the incident between her and Scott Genzler.
16		interpreter.)	16		BY MS. CALEM:
17		THE INTERPRETER: She said she's con she	17	Ω.	Okay. And so you're saying Russ and Gary started
18		said she is confused. She went to mediation this	18	~	assigning you to work with Scott with Juan
19		year 2017.	19		after the Scott Genzler incident?
20		BY MS. CALEM:	20	Α.	(In English without translation of question)
21	Q.	In 2017, yes, we had the mediation. So it was	21	- 155E	Yes.
22	E.	after the mediation that you took that picture?	22	Ω.	And you're sure it didn't happen before that?
23	A.	(In English) Yes. (Through interpreter) Yes.	23	A.	When Scott put me as to be separate, like to
24	Q.	Because Ruby told you to take pictures?	24		separate, to work separate, and when he said if
	A.	(In English without translation of question)	25		we bring more drama into the comp the
	α.	(In Engited without translation of question)	1 -0		" " "

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1		department, he's going to fire us, we didn't have	1		THE WITNESS: (Speaking Swahili to
2		any issue.	2		interpreter.)
3	Q.	And you don't remember the specific date in	3		THE INTERPRETER: Did BJ say that? She's
4		February that you were first told to work with	4		asking.
5		Juan again, do you?	5		BY MS. CALEM:
6		THE WITNESS: February 2017?	6	Q.	Yes. I'm asking if you remember, because the
7		THE INTERPRETER: Yeah, that's correct.	7		notes say that BJ agreed, no, we don't have
8		(Sotto voce discussion between witness and	8		anything in writing.
9		interpreter.)	9	A.	(In English without interpretation of question)
10		She's saying that in January that's when	10		No. It was because BJ when Scott Reed
11		Rusty	11		said I don't have a witnesses, BJ told Scott Reed
12		THE WITNESS: Let me help him a little bit,	12		that this woman have wit it looks like she has
13		I'm sorry.	13		witnesses, and according to the paper Strum
14		After this happened between me and Gonzales,	14		Strum Strum wrote, She has witnesses.
15		after this happened, I didn't know what happened	15	Q.	Okay. Well, do you have anything that Ian Strum
16		to the offices, I don't know what they said, and	16		wrote that says that you're never supposed to
17		I see they started sending me to to work with	17		work with Juan again?
18		the Juan and that's my reason I call the union,	18	A.	I don't have anything else except that record.
19		BJ, and tell BJ, and think BJ, he came in the	19	Q.	So you had to work with Juan again. Did he ever
20		office. That time we have another meeting, me	20		make any other gestures to you?
21		and Scott Reed and BJ, and Scott Reed started	21	A.	The only thing that he showed was he was kind of
22		telling BJ that I don't have a witness, and BJ	22		proud proud of it because they I wanted not
23		told him, I think I see paper here that says she	23		to work with him and, but they put us back
24		have two witness that say everything. And he	24		together so he he had that kind of manhood in
25		said, no, nobody said anything, just only but	25		him, like I am the one, you are nothing
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		he said this woman here, means Yvette, she said	1		(indicating).
2		he said this woman here, means Yvette, she said he make a statement, too, to her, means that he's	2	Q.	<pre>(indicating). So you felt that was his attitude?</pre>
			200	Q. A.	1200 C (1000 HAVE 100 L000 L000 HD 100 HD 10
2		he make a statement, too, to her, means that he's	2	200	So you felt that was his attitude?
2		he make a statement, too, to her, means that he's the one, he does. So Scott really tried to, you	3	200	So you felt that was his attitude? Yeah, that was that's how I felt. And even
2 3 4		he make a statement, too, to her, means that he's the one, he does. So Scott really tried to, you know, to say nothing happened, nobody agree,	2 3 4	A.	So you felt that was his attitude? Yeah, that was — that's how I felt. And even his body language it shows that.
2 3 4 5		he make a statement, too, to her, means that he's the one, he does. So Scott really tried to, you know, to say nothing happened, nobody agree, everybody was disagreeing so. And he and Scott BJ said, no, this thing happened because	2 3 4 5	A.	So you felt that was his attitude? Yeah, that was that's how I felt. And even his body language it shows that. Well, how did it show that?
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_	Sn	nithfield Foods, Inc.			May 24, 2018
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1		they're trying we want Juan to work with you	1		her go slowly because I did not catch everything.
2		so you will quit?	2		(Witness speaking in Swahili.)
3	A.	Nobody told me that but Gary said, if you work	3	A.	On the day that I picked that I picked the job
4		if you make a mistake	4		to do was on Monday, but I don't remember the
5		THE WITNESS: (Speaking Swahili).	5		day. It was at the Hand line, and because he
6	A.	if you work badly or make a mistake with Juan,	6		said that because of my since I have the
7		I'm going I'm going to fire you.	7		seniority, I am able to pick where where I
8	Q.	When did Gary say that?	8		should work.
9	A.	(In English without translation of question)	9	Q.	Okay. Let's just go back to the issue of Juan.
10		It was on the end April Oh, sorry.	10		Okay. So although you had to work with him, he
11		(Through interpreter) At the end at the end of	11		didn't touch you, did he?
12		February.	12	A.	When I was working with him on the Hand line, we
13	Q.	End of February of what year?	13		were too close to the point when he opened his
14	A.	(In English) 2017. (Through interpreter) And she	14		socks and I I
15		said they went to report to Tom	15		THE WITNESS: (In English) Pick up the hams
16		Thomas, right?	16		to clip.
17		THE WITNESS: Yeah.	17	A.	and I pick up the hams to clip, we would touch
18	·A.	to Thomas.	18		each other.
19	Q.	So was anybody there when Gary said that to you?	19	Q.	All right. You would bump elbows?
20	A.	It was three of us. It was me and Juan, because	20	A.	Yes.
21		Juan was reporting something, was reporting to	21	Q.	He didn't make any more sexual gestures, did he?
22		about me to Gary and then Gary came and said	22	A.	No. He didn't he didn't have any he didn't
23		those words to me while the three of us.	23		do any sexual gesture, but the only thing he did
24	Q.	Is this when Juan complained that you were piling	24		was those hand signs I shown like he signalled
25		too many pieces of meat on the rack in front of	25		people and showed them that I am like
		East mode on the fact and the factor of			r-r
		170			172
1			1		
	Α.	170	1 2	Q.	172
1	A. Q.	170 him?	107	Q. A.	172 (indicating).
1 2		170 him? Yes.	2	2550	(indicating). He made a thumbs-down sign?
1 2 3		him? Yes. And they were falling into the hopper in front of	2	2550	(indicating). He made a thumbs-down sign? And that make me that make my heart beat
1 2 3 4		him? Yes. And they were falling into the hopper in front of him, making it hard for him to do his job? Is	2 3 4	2550	(indicating). He made a thumbs-down sign? And that make me that make my heart beat faster to the point where I went to hospital for
1 2 3 4 5	Q.	him? Yes. And they were falling into the hopper in front of him, making it hard for him to do his job? Is that what he what his complaint was? Yeah. That was his complaint, but it was an	2 3 4 5	Α.	(indicating). He made a thumbs-down sign? And that make me that make my heart beat faster to the point where I went to hospital for high blood pressure.
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. A. Q.	him? Yes. And they were falling into the hopper in front of him, making it hard for him to do his job? Is that what he — what his complaint was? Yeah. That was his complaint, but it was an issue because I was working normally, that how I usually do. So you didn't agree with what he said but he made that complaint about you, right? Yeah. That was his complaint because he did not want to work with me anyway. And you had picked that job that morning, hadn't you, on that line with Juan? Russ put me there. On January 10th, 2017, didn't you pick the job to work with Juan on the line? I was open worker, and if you're open worker, they put you wherever they want. In the morning, they say 7 to 8 they say you work there, and then	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. A. Q. A. Q.	(indicating). He made a thumbs-down sign? And that make me — that make my heart beat faster to the point where I went to hospital for high blood pressure. Because he made a thumbs-down sign towards you? Because he was signalling to people who are in different lane, like on different side, and he just, you know, signal like that (indicating) and show them that I That he would signal to other people, point at you, and then make a thumbs-down sign? Yeah. Yeah. That's how I — and, yes, that's what he did and then I felt like I'm — I'm nothing, I'm trash in that department. Okay. Is that why you took out a protective order against Juan? Yes. And you went to court and you asked that Juan be kept 100 miles away from you?
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A. Q. A. Q.	him? Yes. And they were falling into the hopper in front of him, making it hard for him to do his job? Is that what he what his complaint was? Yeah. That was his complaint, but it was an issue because I was working normally, that how I usually do. So you didn't agree with what he said but he made that complaint about you, right? Yeah. That was his complaint because he did not want to work with me anyway. And you had picked that job that morning, hadn't you, on that line with Juan? Russ put me there. On January 10th, 2017, didn't you pick the job to work with Juan on the line? I was open worker, and if you're open worker, they put you wherever they want. In the morning, they say 7 to 8 they say you work there, and then they come later, they'll say, go there, go there,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q. A. Q. A.	(indicating). He made a thumbs-down sign? And that make me that make my heart beat faster to the point where I went to hospital for high blood pressure. Because he made a thumbs-down sign towards you? Because he was signalling to people who are in different lane, like on different side, and he just, you know, signal like that (indicating) and show them that I That he would signal to other people, point at you, and then make a thumbs-down sign? Yeah. Yeah. That's how I and, yes, that's what he did and then I felt like I'm I'm nothing, I'm trash in that department. Okay. Is that why you took out a protective order against Juan? Yes. And you went to court and you asked that Juan be kept 100 miles away from you? I asked them not to be close with him but I did
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173 1 Q. If you'd take a look at Subbit 20 and tell amil 1 2 you recognize this. 3 A. I know I went to ask for this restriction order. 4 Q. Did anybody accompany you when you went to court to get this? 5 A. No. 7 Q. And then on the second to the last page — 8 Do you want to take a break? 9 THE HYDERERIES: (Translating.) 10 THE HYDERERIES: (Translating.) 11 MS. NCLUME: Sale; take a break. 11 MS. NCLUME: Sale; take a break. 12 MS. NCLUME: Sale; take a break. 13 MS. NCLUME: Sale; take a break. 14 THE TYDERERIES: (Translating.) 15 We're going off the record one. It's 2:15. 16 (a record was taken at this time.) 17 VIDERERIES: (Asy, Wa're back on the record. We was taken at this time.) 18 YES. CALOM: Sale; taken a break. 19 A. THE HYDERERIES: (Deared one. It's 2:15. 19 A. THE HYDERERIES: (Deared one. It's 2:15. 20 Q. All right. We're back on the record. We was talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about subhits 20, which is the protective at talking about the about 20 and 10 a		SI	atthrield Foods, Inc.			May 24, 2010
2 A. That was Monday and then Twesday he never showed up. 3 A. I know I went to ask for this restriction order. 5 A. No. 7 Q. And them on the second to the last page 10 December 1 to get this? 9 THE DYTEMPSETER: (Translation) 10 THE WITHESS: (No response.) 11 MG. CALDE: Let's take a break. 12 MG. FOCKOR: Sala, you get to take off your wire going off the record now. It's 2:15. 13 MG. CALDE: Let's take a break. 14 THE VILENCORAPHER: Okay. Me're going 15 We're going off the record now. It's 2:15. 16 (A recease was taken at this time.) 17 VIDEOGRAPHER: Okay. Me're back on the record. No ware a record to the last page of the school taken and taken taken and taken the school taken and taken tak			173			175
3 A. I know I went to ask for this restriction order. 4 Q. Did anybody accompany you when you went to count to to go this? 5 A. No. 7 Q. And there on the second to the last page 8 De you want to take a break? 8 THE INTERSETIES (Translating.) 9 THE WITHESS: (Dranslating.) 11 MS. CALEM: Total take a break? 12 MS. CALEM: Jet's take a break? 13 microphone. 14 THE VIDEOGRAFHER: Okay. We're going 15 We're going off the record now. It's 2:15. 16 (A recors was taken at this time.) 17 VIDEOGRAFHER: Okay. We're back on the record. We were 21 taiking about Enhibit. 20, which is the protective order anyone that John was ofraid to come taiking about Enhibit. 20, which is the protective order anyone that John was ofraid to come into work because of this protective order anyone that John was ofraid to come into work because of this protective order anyone that John was ofraid to come into work because of this protective order anyone that John was ofraid to come into work because of this protective order anyone that John was ofraid to come into work because of this protective order anyone that John was ofraid to come into work because of this protective order anyone that John was ofraid to come into work because of this protective order anyone that John was ofraid to come into work because of this protective order and loat his Job 20 Can John was dead this request on that date? 21 THE WITHERSE (I may lish) Un-uh. 22 A. I went there — I went there by mywelf. 23 A. I went there — I went there by mywelf. 24 A. The next day be disn't come, sorry, And then 25 THE WITHERSES (If English) Un-uh. 26 Can John was a fraid of the was one. 27 THE WITHERSES (If English) Un-uh. 28 Caled Man and told his the second dup to disn't come, sorry, And then 29 A. The second of the second of the same page again, mext to the last page. 29 THE WITHERSES (If English) Un-uh. 20 Can John was a fraid of the second. 20 Can John was a fraid of the last page. 21 THE WITHERSES (If English) Un-uh. 22 Can John was a fraid of the last page. 23 THE WITHER	1	Q.	If you'd take a look at Exhibit 20 and tell me if	1		THE WITNESS: (Speaking Swahili).
4 Q. Did anythody accompany you when you went to court 5 A. No. A. No. A. No. Do you want to take a break? THE UNIMESE HE reason to the last page — B. Do you want to take a break? THE UNIMESE HE reason to take a break? THE UNIMESE HE reason to take of your Selected the reason to the last page of the school of the last page of the school of take of your THE VINIMESE HE reason to take of your THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE going — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON TO ANY WE'RE GOING — THE VINIMESE HE REASON T	2		you recognize this.	2	A.	That was Monday and then Tuesday he never showed
5 A. No. 7 Q. And then on the second to the last page — 5 Do you want to take a break? 8 Do you want to take a break? 9 THE NITEMPRETER: (Translating.) 10 THE WIRESETTIR: (Translating.) 11 NN. CALEM: Let's take a break. 11 NN. CALEM: Let's take a break. 12 NN. POCING: Sala, you got to take off your microphone. 13 microphone. 14 THE WIDDOGRAPHER: Okay. We're going — 15 we're going off the remond now. It's 2:15. 16 (A recess was taken at this time.) 17 VIDDOGRAPHER: Okay. We're back on the remord. We were talking about Exhibit. 18 PM NS. CALEM: 19 NY MS. CALEM: 20 Q. All right. We're back on the remord. We were talking about Exhibit. 21 THE NITEMPRETER: To lant page, right? 22 order. And if you could look at the next to last page of this subhibit. 23 THE NITEMPRETER: To lant page of the exhibit. 24 THE LITEMPRETER: To lant page of the exhibit. 25 NY MS. CALEM: 26 And of you could look at the next to last page of this middlik is a productive order? 27 NY MS. CALEM: 28 THE LITEMPRETER: To lant page, right? 29 NY MS. CALEM: 20 Q. All right. This page of the exhibit. 20 Q. All right. This page of the exhibit. 21 The page of the search and projection order. 22 NY MS. CALEM: 23 Day you are that? 24 A when you did this; 25 Day you are that? 26 A litight. And I — I spelogize if you answered this aready. Did anyone come with you count this you alked the count to work because of the company? 26 THE NITEMPSETS: (In English) The next day he came. 27 THE NITEMPSETS: (In English) The next day he came. 28 THE NITEMSS: (In English) thin-th. 29 THE NITEMSS: (In English) thin-th. 20 (Nell, do you remember telling one of your decored for sexual answered to go count with, and the came. 29 THE NITEMSS: (In English) thin-th. 20 (Nell, do you remember telling one of your decored for yo	3	A.	I know I went to ask for this restriction order.	3		up.
6 A. No. 7 Q. And then on the second to the last page 8 Do you want to take a break? 9 THE NUMEREREER: (Translating.) 10 HEN WITHESS: (No response.) 11 NS. CALEM: Let's take a break. 12 NS. POCKOY: Sale, you gut to take off your is miscrophone. 14 NS. CALEM: Let's take a break. 15 NS. POCKOY: Sale, you gut to take off your is miscrophone. 16 (A recess was taken at this title.) 17 VINDEOGRAPHER: Okay. We're going 18 record. It's Dow 2:2) p.m. 19 SY MS. CALEM: Says We're back on the record. We were cord. It's Dow 2:2) p.m. 19 SY MS. CALEM: Says Contained the form of the taken about the last page of the exhibit. 20 Q. All right. Me're back on the record. We were corder. And if you could look at the next to last page of this exhibit. 21 A. (Complies.) 22 A. (Complies.) 23 P. MS. CALEM: Says page 3 at the bettom. It's 25 Co ahead. 24 THE INTERRETENT: To last page of the exhibit. 25 A. (Complies.) 26 A. Yes, I.So. 27 Ocker that unan not sees within 100 makes of your assisted the Court for a period of five years to corder that unan not sees within 100 makes of your assisted the Court for a period of five years to corder that unan not sees within 100 makes of your assisted the court when you did this? 28 A. Yes, I.So. 29 A. Yes, I.So. 30 A. Yes, I.So. 40 Q. All right. And I — I apologice if you answered the your page assisted the Court for a period of five years to corder that unan not sees within 100 makes of your down and this request for hearing and protection order. 31 A. Yes, I.So. 32 A. I went there — I went there by myself. 33 A. I went there — I went there by myself. 34 A. I went there — I went there by myself. 35 A. I went there — I went there by myself. 36 A. I went there — I went there by myself. 37 A. I went there — I went there by myself. 38 A. (I maplish) Un-uh. 39 A. Went the ment day he ddo't come to come into work anymore, did he? 30 A. I he med day he ddo't come of your dectors that the ment day he work anymore, did he? 31 A. He med came and then for — 32 A. He med tay he ddo't come, sorry. And th	4	Q.	Did anybody accompany you when you went to court	4		THE WITNESS: (Speaking Swahili).
And then on the second to the last page— 8	5		to get this?	5	A.	I I heard that since he missed the second day,
By Do you want to take a break? THE NITEMPERENCE (Translating.) THE WITEMPERENCE (Not prosponse.) THE WITEMPERENCE (Not a break.) THE WITEMPERENCE (Not you got to take off your take come within 100 miles of your take take the course of the second now. It's Zilb. The WITEMPERENCE (Translating.) The WITEMPERENCE (Translatin	6	A.	No.	6		HR called him and told him that he didn't call,
THE NITERITECTER: (Translating.) THE NITERITECTER: (Translating.) THE NITERITECTER: (Translating.) THE NITERITECTER: (Translating.) THE NITERITECTER: (No reagenese.) NS. CALEN: Let's take a break. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. POCHOF: Sals, you got to take off your microphone. NS. Poch Noney Line to decade and line, what's the distance that is in between witness and interpreters. NS. Poch Noney Line to decade Band line, what's the distance that is in between Witness and interpreters. NS. CALEN: (A vere back on the record. We were talking about Enhibit 20, which is the protective order to that. Then doging to argue with you about it. Did you hear from anyone that Juan was afraid to come into work because of this protective order? THE NITERIPHETER: To lant page, right? The Norther Mark Town and protection order, asked the Court for a period of five years to order that Juan and protection order, asked the Court for a period of five years to order that Juan and protection order, asked the Court for a period of five years to order that Juan was afraid to come into work because of this protective order and lost his job — THE NITERIPHETER: To lant page, right? The NITERIPHETER: To lant page, right? The NITERIPHETER: To lant page of the exhibit. The NI	7	Q.	And then on the second to the last page	7		he didn't show up, and he for that reason, he
10 MS. CALEM: Lot's take a break. 11 MS. CALEM: Lot's take a break. 12 MS. COCACH: Sala, you got to take off your microphane. 13 microphane. 14 THE VIDEOGRAPHER: Okey. We're going — 15 we're going off the record now. It's 2:15. 16 (A recess was token at this time.) 17 VIDEOGRAPHER: Okey. We're back on the record. It's now 2:23 p.m. 18 record. It's now 2:23 p.m. 19 NY MS. CALEM: 19 NY MS. CALEM: 20 Q. All right. We're back on the record. We were talking about Eachibit 20, which is the protective order. And if you could look at the next to last 22 A. Compiles.) 21 THE INTERPRETEN: To last page, right? 22 MS. CALEM: 23 page of this swhibit. 24 THE INTERPRETEN: To last page, right? 25 MS. CALEM: 26 A. COmpiles.) 27 Order that Juan mat come within 100 miles of your source of this protective order and into work because of this protective order? 28 A. Yes, CALEM: 29 page of this swhibit. 20 All right. This shows that you asked the Court, asked the Court for a period of five years to order that Juan mat come within 100 miles of your source of the protective order and lost mate or a sequentify or about it. The not going to argue with you about it. 20 La Mi right. And I — I apologize if you answered to the last page of the exhibit. 21 A. Yes. 22 The without and come within 100 miles of your source of the protective order about interpreter.) 23 page of this swhibit. 24 THE INTERPRETEN: To last page, right? 25 MS. CALEM: 26 A. COmpiles.) 27 Order that Juan mat come within 100 miles of your source of this protective order and lost his job — Comment of the protective order? 28 A. Yes, I.d. 29 A. The without the last page of the exhibit. 29 A. Yes, I.d. 20 All right. And I — I apologize if you answered to the asset page again, must to the last page. 21 THE WITNESS: (In English) The next day he came. 22 The witness: (In English) The next day he came. 23 (Gaesaling Swahiii). 24 THE WITNESS: (In English) Un-uh. 25 (Speaking Swahiii). 26 The mate day he claim? 27 A. The next day he claim? 28 A. The next day he claim?	8		Do you want to take a break?	8		got fired. That's what I heard.
THE MITHESS: (No response.) 10 MS. CALER: Let's take a break. 11 MS. SCHERN: Sala, you got to take off your microphone. 13 microphone. 14 THE VIENDEGRAPHER: Okay. Ne're going — 15 we're going off the record now. It's 2:15. 16 (A recome was taken at this time.) 17 VIENDEGRAPHER: Okay. Ne're back on the record. We were cord. It'n now 2:23 p.m. 18 record. It'n now 2:23 p.m. 19 DY MS. CALER: 10 Q. All right. Ne're back on the record, we were tailing about Exhibit 20, which is the pretentive order. And if you could look at the next to last page of this exhibit. 19 A. COmpilee.) 20 All right. This shows that you asked the Court, says request for beating and protection order, asked the Court for a period of five years to order that Juan not come within 100 miles of you. 21 THE INTERPRETER: To last page of the exhibit. 22 A. Compilee.) 23 By MS. CALEM: 4 Q. All right. This shows that you asked the Court, says request for beating and protection order, asked the Court for a period of five years to order that Juan not come within 100 miles of you. 22 This in Indian not come within 100 miles of you. 23 Dyou was Chalf. 4 Q. All right. And I — I apologise if you answered to work anywore, did he? 24 The many own did this? 25 A. Twent there — I went there by myself. 26 A. The next day he came. 27 THE WITHESS: (In English) The next day he came. 28 THE WITHESS: (In English) The next day he came. 29 THE WITHESS: (In English) Un-uh. 20 (Sotto voe discussion hetween withess and interpreters.) 20 All right without the last page of the exhat in interpretical distance that is in between? Now many feet is distance that is in between? Now many feet is distance that is in between? Now many feet is distance that is in between? Now many feet is distance that is in between? Now many feet is distance that is in between? Now many feet is distance that is in between? Now many feet is that? 29 The WITHERPRETER: To last page of the exhibit. 20 The WITHERPRETER: (Interpreting) 21 The WITHERPRETER: (Interpreting) 22	9		THE INTERPRETER: (Translating.)	9	Q.	How was he supposed to come to work if you had a
microphane. microphane. microphane. mit VIDSOGARPHER: Okay. We're going — the Ve're going off the record now. It's 2:15. the Ve're going off the record now. It's 2:15. microphane. (A recess was taken at this time.) the VIDSOGARPHER: Okay. We're back on the cord. We vere going off the record. We're back on the record. We vere good. It's now 2:23 p.m. mit video off the vere back on the record. We vere go go go fit in the video order. And if you could look at the next to last page of this exhibit. microphane. 174 185 microphane. 186 (A recess was taken at this time.) 187 microphane. 187 microphane. 188 microphane. 189 microphane. 180 microphane. 180 microphane. 180 microphane. 181 microphane. 184 microphane. 185 microphane. 185 microphane. 186 microphane. 187 microphane. 188 microphane. 189 microphane. 180 microphane. 180 microphane. 180 microphane. 181 microphane. 182 microphane. 184 microphane. 185 microphane. 185 microphane. 186 microphane. 187 microphane. 187 microphane. 188 microphane. 189 microphane. 180 microphane. 181 microphane. 182 microphane. 184 microphane. 185 microphane. 186 microphane. 187 microphane. 189 microphane. 180 microphane. 180 microphane. 180 microphane. 180 microphane. 180 microphane. 181 microphane. 182 microphane. 183 microphane. 184 microphane. 185 microphane. 185 microphane. 185 microphane. 187 microphane. 187 microphane. 187 microphane. 187 microphane. 187 microphane. 180 microphane. 180 microphane. 181 microphane. 182 microphane. 183 microphane. 184 microphane. 185 microphane. 185 microphane. 186 microphane. 187 microphane. 1	10		THE WITNESS: (No response.)	10		protective order saying he wasn't supposed to
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23 (Speaking Swahili). 24 A. The next day he didn't come, sorry. And then 23 A. Yeah. I told the doctor because there was one 24 lady who Juan wanted to go out with, and the	21	A.	the next day he came.	21		that the man who was harassing you was fired for
24 A. The next day he didn't come, sorry. And then 24 lady who Juan wanted to go out with, and the				22		sovual assault?
			THE WITNESS: (In English) Uh-uh.			Sexual assault:
25 after that, the following day he showed up. 25 woman did not like it so that's what I heard from	22				A.	VARIOS EN 2004 NO NA NEWOLD NO NEWS AND RESERVE STATES.
	22 23	A.	(Speaking Swahili).	23	A.	Yeah. I told the doctor because there was one

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1		ways you believe you were retaliated against was	1		you got to leave your phone in the locker.
2		by being made to work with Juan. Is there any	2	Q.	Well, you have your phone with you to take
3		other way you think you were retaliated against?	3		pictures, don't you?
4	A.	There is another incident that happened on	4	A.	I started doing it because Ruby told me to take
5		March 2nd after the humiliation	5		picture and then I it wasn't me I'm not the
6		MS. CALEM: Humiliation.	6		only one who carried the phone with me on the
7	A.	and my my kid got sick.	7		line. Seems like everybody has that
8		(Sotto voce discussion between witness and	8		THE WITNESS: (Speaking in Swahili and
9		interpreter.)	9		English.)
10	A.	There regular like the regulation, there is a	10	A.	And there was somebody who had an iPod
11		number that was given. There's a number on the	11		MS. CALEM: I under yeah, I understood
12		ID. So there's a emergency if a child if a	12		COURT REPORTER: Well, I didn't. I
13		child or if there is some emergency happening	13		Go ahead.
14		at home, they're supposed to call the number and	14	A.	There was somebody who had an iPod with him and
15		they're called personnel office and pass the	15		he took picture of me and then nothing happened
16		message so the personnel might call on the floor	16		to him, so because of it, I decided to carry the
17		and they notify the person who is who is	17		phone.
18		wanted to go, if there's a child, to go back home	500000	Q.	All right. Now, on this day March 2, 2017,
19		and take the child to the hospital.	19	-	Maggie told you that the personnel office said,
20		On this day since this thing happened,	20		no, we can't deliver the message?
21		Maggie called me so that I can take my child to	21	A.	(In English without translation of question)
22		hospital	22		Yes.
23		ANTONIO TORONO T	23	Q.	All right. And did you speak to anyone in the
24	Α.	COURT REPORTER: Say that again.	24	Q.	personnel office about that?
25	А.	Maggie called personnel office, personnel office	1000000	Α.	(In English without translation of question)
25		to notify me that the child is sick. They told	20	22.	
					19/
		182	-4		184
1		Maggie, no, we can't do that. Because that's how	1		I'm not supposed to speak to anybody because
2		Maggie, no, we can't do that. Because that's how normally Maggie would do it, before she would do	2	•	I'm not supposed to speak to anybody because that's their position
2		Maggie, no, we can't do that. Because that's how normally Maggie would do it, before she would do it. She would just call personnel and personnel	2	Q.	I'm not supposed to speak to anybody because that's their position My question is, did you go to the personnel
2 3 4		Maggie, no, we can't do that. Because that's how normally Maggie would do it, before she would do it. She would just call personnel and personnel would notify me and they will send me home to	2 3 4		I'm not supposed to speak to anybody because that's their position My question is, did you go to the personnel office and ask about it?
2 3 4 5		Maggie, no, we can't do that. Because that's how normally Maggie would do it, before she would do it. She would just call personnel and personnel would notify me and they will send me home to take the child to the hospital. But on that day,	2 3 4 5	Q. A.	I'm not supposed to speak to anybody because that's their position My question is, did you go to the personnel office and ask about it? (In English without translation of question)
2 3 4 5 6		Maggie, no, we can't do that. Because that's how normally Maggie would do it, before she would do it. She would just call personnel and personnel would notify me and they will send me home to take the child to the hospital. But on that day, they told her, no, you're supposed to call her.	2 3 4 5 6	A.	I'm not supposed to speak to anybody because that's their position My question is, did you go to the personnel office and ask about it? (In English without translation of question) No.
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		itilitieta roods, me.	T		101
		189		828	191
1		Other employees.	1	A.	They haven't called it hadn't happened yet.
2	Q.	Which ones?	2		They haven't (inaudible)
3	A.	(In English without translation of question)	3		COURT REPORTER: They haven't what?
4		Which ones? Analem (sp).	4		THE INTERPRETER: They haven't called.
5	Q.	Analem told you?	5		BY MS. CALEM:
6	A.	(In English without translation of question)	6	Q.	And on that occasion when you found out that your
7		Yeah.	7		child had gone to the hospital, was the child
8	Q.	Okay. So Analem told you Kamesu got a call, she	8		admitted to the hospital?
9		had to go home because her child was sick?	9	A.	She took her to the clinic but they couldn't hurt
10	A.	(In English without translation of question)	10		[sic] because Maggie is not a parent of the
11		I told you I can't I'm not for sure if it	11		child.
12		was Kamesu and Elda, but I knew somebody was	12	Q.	So when you came when you finished with work,
13		called after mediation that he got an emergency	13		did you have to take your child to the doctor?
14		home, or she.	14	A.	I went to the pharmacy and get some meds and give
15	Q.	All right. And Analem told you about this?	15		to her.
16	100	(In English without translation of question)	16	Q.	Is there any other example of how you believe you
17	Α.	Yeah. It's not We can see we can see	17	2.	were retaliated against?
18			18	Α.	There was it was somewhere in August, between
19	1 -	in our eyes when Lisa, she came with the note,	19		the 23rd and 28th, one time they gave me eight
		you have to go call this number, you have an	20		
20		emergency at home.		•	vats
21	Q.	And other than that one occasion where your	21	Q.	Eight vats?
22		Maggie said they would not deliver a message to	22	A.	eight vats
23		you, did Maggie tell you who she spoke to in	23		THE WITNESS: (In English) Of Arby's.
24		personnel?	24	A.	of Arby's to do it by myself. And I tried to
25		THE INTERPRETER: Repeat that question,	25		seek help and they refuse to no to anyone who
					97 × 100
		190			192
1		please.	1		192 wanted to help and they told them I do not need
1 2		¥	2	San Tu	
	Q.	please.	A STATE OF THE STA	Secretary -	wanted to help and they told them I do not need
2	Q.	please. BY MS. CALEM:	2		wanted to help and they told them I do not need help.
2	Q.	please. BY MS. CALEM: Did Maggie tell you who she spoke to in	3		wanted to help and they told them I do not need help. COURT REPORTER: Okay. You say eight vats
2 3 4		please. BY MS. CALEM: Did Maggie tell you who she spoke to in personnel?	3 4		wanted to help and they told them I do not need help. COURT REPORTER: Okay. You say eight vats of?
2 3 4 5		please. BY MS. CALEM: Did Maggie tell you who she spoke to in personnel? I don't remember the name exactly, but it started	3 4 5	Service III	wanted to help and they told them I do not need help. COURT REPORTER: Okay. You say eight vats of? THE WITNESS: (In English) Arby's.
2 3 4 5 6		please. BY MS. CALEM: Did Maggie tell you who she spoke to in personnel? I don't remember the name exactly, but it started with K, KK, something like that. I tried to save	3 4 5 6		wanted to help and they told them I do not need help. COURT REPORTER: Okay. You say eight vats of? THE WITNESS: (In English) Arby's. MS. CALEM: Do you mean ribs?
2 3 4 5 6 7		please. BY MS. CALEM: Did Maggie tell you who she spoke to in personnel? I don't remember the name exactly, but it started with K, KK, something like that. I tried to save the number on the old phone but the phone was	2 3 4 5 6 7		wanted to help and they told them I do not need help. COURT REPORTER: Okay. You say eight vats of? THE WITNESS: (In English) Arby's. MS. CALEM: Do you mean ribs? THE WITNESS: (In English) No. Arby's.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. Q. A.	please. BY MS. CALEM: Did Maggie tell you who she spoke to in personnel? I don't remember the name exactly, but it started with K, KK, something like that. I tried to save the number on the old phone but the phone was — the phone has got screwed. THE WITNESS: (In English) Messed up. It's kind of messed up so I don't have the number but I save on my other phone. You saved it on your own phone? THE INTERPRETER: The old one. BY MS. CALEM: The old one, okay. (In English, without interpretation) I was going to save it but my phone got messed up. The day I got suspended three days, I was — my mind was going crazy and, I don't know, I was in the bathroom. When I come out, my phone was deep inside the bathroom so it messed up and	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21		help. COURT REPORTER: Okay. You say eight vats of? THE WITNESS: (In English) Arby's. MS. CALEM: Do you mean ribs? THE WITNESS: (In English) No. Arby's. MS. CALEM: Arby's? THE WITNESS: (In English) In some — some production is big like this, so you have to take one and by one (indicating), put on the table, but usually it must do two people because it heavy meat with a small hook and a long hook, so you have to be dig inside and put on the table so they always put the one this side and other this side. But that day, people that was leaving go home, Honey line, they was already finished. And I ask help. They say, no, you don't need the help. And people, they want to say to make hours to work, even her (indicating), she ask, I can stay? Lisa, she said, no, you don't have to

_	-	attnifeld Foods, Inc.			Hay 24, 2010
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1		eight vats by myself.	1		the meat out of the vat?
2	Q.	All right. And this — is this Lisa who assigned	2	A.	So some device are taller than the other. Some
3	e 📗	you to this work?	3		of them are just this tall and some of them will
4	Α.	(In English without translation of question)	4		be just right on the stomach (indicating). And
5		Right. That was with Gary.	5		when the vats is is full, it's much easier to
6	Q.	Okay. And you filed a grievance over this,	6		use the little hook and, you know, drop on the
7	03	right?	7		on the table, but when it's going down, it's much
8	A.	(In English without translation of question)	8		harder because you got to use the long hook to
9	E	Right.	9		get it up and to use the small hook to throw it
10		MS. CALEM: All right. So let's make that	10		on the table.
11		grievance an exhibit.	11	Q.	All right. And once you throw the meat on the
12		(Naambwe Deposition Exhibit 21 marked.)	12		table, what are you supposed to do with it?
13	Q.	Okay. So I think the day that that happened was	13	A.	Once you you drop them or you put them on the
14		August 22 or 23.	14		table, there is two other guys that are supposed
15	A.	On the 22nd is the day that I was being left	15		to hang them on on the tree. So your job is
16		left alone working by myself, and then on the	16		to make sure it did not stop it or slowing down.
17		23rd, the same thing happened because there	17		You got to make sure they having something to do.
18	1775	were	18	Q.	Now, have you ever seen anybody work on the
19	11 11 11	Two people, right?	19		Arby's by themselves?
20	Č.	THE WITNESS: (In English) Yeah.	20	Α.	After after my complaint, I saw
21	A.	there were two people working on five vats,	21		Who?
22		and I had to call BJ to come witness with his own	22		THE WITNESS: (In English) Becky.
23	12	eyes what what's going on.	23	A.	I saw Becky doing it, but the difference was
24	Ω.	So on the 22nd you were on your own. On the 23rd	24		Becky had one person hanging the meat on the tree
25	R.	there were a lot of people working?	25		and she was by herself on the vats, you know,
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1	A.	Two people on the vats.	1		putting the meat on the table which is different
2	Q.	Okay. And are the vats of Arby's meat, is that	2		than I have two people hanging meat on the tree
3		something that's done every day?	3		where I'm pulling those meat by myself.
4	e.		Α.		
5		THE INTERPRETER: She said in the slow time	4	Q.	Okay. So you saw Becky doing it alone but she
6	i	THE INTERPRETER: She said in the slow time like this, we do we do we do work on	5	Q.	Okay. So you saw Becky doing it alone but she only had one person hanging the meat on the
7			25	Q.	200 AV 20
	É	like this, we do we do we do work on these on these	5	Q.	only had one person hanging the meat on the
8		like this, we do we do we do work on	5 6	_	only had one person hanging the meat on the trees, you had two. Is that what you're saying?
8	A.	like this, we do we do we do work on these on these THE WITNESS: (In English) Arby's.	5 6 7	Α.	only had one person hanging the meat on the trees, you had two. Is that what you're saying? (In English) Yeah. (Through interpreter) Yes.
	А.	like this, we do we do we do work on these on these THE WITNESS: (In English) Arby's Arby's and the ribs, like, for a month or	5 6 7 8	Α.	only had one person hanging the meat on the trees, you had two. Is that what you're saying? (In English) Yeah. (Through interpreter) Yes. And did you ever see Wally Mohammed doing this
9		like this, we do we do we do work on these on these THE WITNESS: (In English) Arby's Arby's and the ribs, like, for a month or weeks working on them	5 6 7 8 9	A. Q.	only had one person hanging the meat on the trees, you had two. Is that what you're saying? (In English) Yeah. (Through interpreter) Yes. And did you ever see Wally Mohammed doing this alone?
9 10		like this, we do we do we do work on these on these THE WITNESS: (In English) Arby's Arby's and the ribs, like, for a month or weeks working on them (Sotto voce discussion between witness and	5 6 7 8 9	A. Q.	only had one person hanging the meat on the trees, you had two. Is that what you're saying? (In English) Yeah. (Through interpreter) Yes. And did you ever see Wally Mohammed doing this alone? I don't know because where we are, there is a
9 10 11		like this, we do we do we do work on these on these THE WITNESS: (In English) Arby's. Arby's and the ribs, like, for a month or weeks working on them (Sotto voce discussion between witness and interpreter.)	5 6 7 8 9 10	A. Q.	only had one person hanging the meat on the trees, you had two. Is that what you're saying? (In English) Yeah. (Through interpreter) Yes. And did you ever see Wally Mohammed doing this alone? I don't know because where we are, there is a wall that is between us. That means you can't
9 10 11 12	A.	like this, we do we do we do work on these on these THE WITNESS: (In English) Arby's. Arby's and the ribs, like, for a month or weeks working on them (Sotto voce discussion between witness and interpreter.) and on the busy time, we don't see them, they	5 6 7 8 9 10 11 12	A. Q. A.	only had one person hanging the meat on the trees, you had two. Is that what you're saying? (In English) Yeah. (Through interpreter) Yes. And did you ever see Wally Mohammed doing this alone? I don't know because where we are, there is a wall that is between us. That means you can't see what's going on on the other side.
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		197			199
1		interpreter.)	1		Hillberg, Gary Loger and Sala Naambwe in human
2	A.	If if it would happen, like, one of you	2		resources on September 12th, 2016. Do you
3		know, if it happen, if I was there, I will	3		remember that meeting?
4		just I will have seen it before, but the	4	A.	Never.
5		reason why I call BJ is because I never seen	5	Q.	Can you look at this document, look at the first
6		somebody doing that before.	6		sentence.
7	Q.	And so Exhibit 21 is the grievance that you	7		(Sotto voce discussion between witness and
8		filed?	8		interpreter.)
9	A.	Yes.	9	A.	I have never sat down with in a conference
10	Q.	And Monica Derby did an investigation, didn't	10		like like how it is written here in a meeting
11		she?	11		with me and these people right here. The only
12	A.	I don't even know, who's Monica?	12		time that HR is when I go down to HR, I talk to
13	Q.	Monica Derby in human resources?	13		Scott Reed.
14	A.	I only know Scott Reed and Carrie. Those are the	14	Q.	Do you remember on any occasion Monica telling
15		only two people that I know.	15		you or anybody telling you that they had reviewed
16	Q.	Okay. Well, there's some notes from human	16		the payroll for August 22nd to see how many
17		resources and Monica's notes saying that she had	17		people were available to work that day?
18	5 5 v	interviewed people relating to your grievance.	18		(Interpretation in progress.)
19		And then it says she met with you and BJ and Tom	19		THE INTERPRETER: The payroll for?
20		Zuroff and Tom Anderson afterwards to talk about	20		MS. CALEM: They reviewed the payroll for
21		the grievance.	21		the department to see how many people were
22		No, I'm sorry, let me take that back. She	22		available on August 22nd.
23		says she met with you and BJ and Lisa Christion	23	A.	I don't know anything about payroll because we
24		to talk about the grievance. You don't remember	24		never discuss about salaries.
25		that?	25	Q.	No. I'm not talking about salaries. I'm just
		198			200
1	A.	I never sat down with Lisa in any room anywhere	1		saying, do you remember Monica said she checked
2		to discuss about	2		the payroll to see how many people were working
3	Q.	Okay.	3		on August 22nd?
4	A.	anything.	4	A.	When? When did this happen?
5	Q.	Okay. So maybe I'm wrong on these notes.	5	Q.	Well, you say you don't remember this meeting.
6		Afterwards, do you remember any discussion with	6		The notes show she gave you this information at a
7		anybody about your grievance?	7		meeting. You say you didn't go to that meeting,
8	A.	I went to talk to the union because I wanted a	8		so I'm just asking you whether Monica told you
9		copy of it, of this this complaint, and	9		that there weren't so many people available in
10		because HR, they never, ever give me every	10		the department that day and she knew because she
11		time I take down a complaint, they never, ever	11		looked at the payroll.
12		make a copy on me. They only copy they do, they	12	A.	The only the only meeting that I can recall is
13		make one copy there. They're supposed to make	13		a meeting that I had, me and Scott Reed and there
14		copy one for them, the original for them, the	14		was another lady that I that I saw for the
15		copy one copy to the union, and then a copy to	15		first time, I can't remember her, but that
16		me. So I went to the union after this to get	16		meeting was because of my attendance because she
17		this copy because I knew HR would never give me a	17		had a paper and she was showing me the other
18		copy.	18		employees are working nine hours but I'm working
19		MS. CALEM: Okay. Can we mark this next in	19		less than nine hours. Then I told her that I'm
20		order, please.	20		sick, I'm always I'm taking I mean, I'm
21		(Naambwe Deposition Exhibit 22 marked.)	21		punching out to go to hospital and that is when I
22	Q.	Exhibit 22 is a document that you may not have	22		got suspension for my for my attendance.
23		seen before but it's a memo from Monica. And	23		That's the only meeting that I recall can Scott
24		it's a memo to Scott Reed, and it says that	24		Reed.
25		Monica Derby met with BJ, Tom Zuroff, David	25	Q.	Well, I'm going to read a little bit of

		201			203
4		201	1		
1 2		Exhibit 22 and you tell me if you remember	2	A.	or no.
	_	anything, like any conversation of this sort.	3		Yes, it is made up.
3	Α.	Yes.	4	Q.	Okay. On the day that you were working by yourself on Arby's, isn't it true that seven
4	Q.	All right. So this memo from Monica says, I	5		The second secon
5		began by informing Sala that BJ and I have spent	6		people were on leave that day?
6		much time on her concern and have conducted a	2.00		THE INTERPRETER: The whole Honey line was
7		thorough investigation. BJ asked Sala to explain	7		gone, she said.
8		her grievance and Sala expressed that she was	8	0	BY MS. CALEM:
9		working by herself Monday on Arby's and on	9	Q.	My question was, on that day, do you know if
10		Wednesday they had four people. She asked for	10		seven people were on leave, they were on
11		help but others had been sent home.	11	Defa	vacation?
12		All right. That was your grievance, right,	12	A.	I don't know.
13		that you were working by yourself?	13	Q.	All right. And did you know that when they
14	A.	Yes.	14		checked people's hours, there were nine people
15	Q.	Okay. And do you remember Monica saying that she	15		who had worked only a little bit less time than
16		and BJ had done an investigation?	16		you?
17	A.	Now, for this grievance I remember.	17	A.	I don't know.
18		(Sotto voce discussion between witness and	18	Q.	Is the Arby's work assigned based on seniority?
19		interpreter.)	19	A.	No.
20	A.	The personnel office called me. They call me, I	20	Q.	No?
21		was working, and then I went downstairs and they	21	A.	(In English without translation of question)
22		told me that I was I was wanted and then they	22		No.
23		send me to Carrie, and then Carrie did not want	23		THE INTERPRETER: Arby's is a she say, is
24		to speak to me. She send she send me to	24		a job when when people are they have extra
25		Monica, and I went to Monica and	25		people, they send them to do it. It doesn't
		202			204
1		202 (Sotto voce discussion between witness and	1		mean the people
1 2			2		N. m. Ar
	Α.	(Sotto voce discussion between witness and	80		mean the people
2	Α.	(Sotto voce discussion between witness and interpreter.)	2		mean the people You can't sign up for Arby's, is that what
2	Α.	(Sotto voce discussion between witness and interpreter.) and I found she had the grievance complaint on	2	Α.	mean the people You can't sign up for Arby's, is that what you
2 3 4 5 6	Α.	(Sotto voce discussion between witness and interpreter.) and I found she had the grievance complaint on his desk so she asked me, do you know anything	2 3 4 5 6	A.	mean the people You can't sign up for Arby's, is that what you THE WITNESS: (In English) No, you can't.
2 3 4 5	Α.	(Sotto voce discussion between witness and interpreter.) and I found she had the grievance complaint on his desk so she asked me, do you know anything about this, and I say yes. And then she said,	2 3 4 5	Α.	<pre>mean the people You can't sign up for Arby's, is that what you THE WITNESS: (In English) No, you can't you cannot sign up for Arby's because that's</pre>
2 3 4 5 6	Α.	(Sotto voce discussion between witness and interpreter.) and I found she had the grievance complaint on his desk so she asked me, do you know anything about this, and I say yes. And then she said, yes, I see your complaint, you're complaining,	2 3 4 5 6	A.	<pre>mean the people You can't sign up for Arby's, is that what you THE WITNESS: (In English) No, you can't you cannot sign up for Arby's because that's not a job that's always there so the people that</pre>
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		205			207
1	A.	It was an easy job that I was doing.	1		And, yes, he put me in the alley, you know,
2		THE INTERPRETER: I don't know how I can	2		in the room, hams room. It was some spray, black
3		explain, but she said she was doing the meat	3		spray so you spray on top of alley. I was work
4	t	what do you call it she was doing the meat	4		with the Gonzales and, you know, I have allergy
5		like this. I don't know how you call it. And -	5		with something like that. So whatever Gonzales,
6	Q.	Wait. She was doing meat like this?	6		he sprayed, some some spray come to my face
7	Α.	(In English) The hams. (Through interpreter) The	7		and I was yes, it was all over my body was
8	I	ham.	8		the all the plastic and my helmet. It was
9	Q.	Ham?	9		black, black, like that shit is shit, you know.
10	A.	(In English without translation of question).	10		COURT REPORTER: What?
11		Yeah, because on the Handy line, when	11		THE WITNESS: He say he got the shit and is
12		somebody clip hams, so because the machine was	12		going to shit all over me, yes, it was all over
13		dead, they you have to squeeze the meat like	13		me and I got sick.
14		this (indicating) to make, you know.	14		(Sotto voce discussion between witness and
15	Q.	Okay. So you were sort of massaging the meat by	15		interpreter.)
16	1.50	hand?	16	A.	After he told me that he's going to, like,
-	A.	(In English without translation of question).	17	- 4	whatever, he made that comment he's going to shit
18		Yeah, massage meat by hand. So you push on	18	2	on me, he put me in a room where there is
19		trim med, and that's the job I was doing	119		something like liquid and stuff where you put
20	Q.	Okay.	20		it you put on
21	A.	and Gary bring a brown helmet, she just have	21		THE WITNESS: (In English) On some machine.
22	1	one, like, two week - two weeks, and she bring	22	Q.	on some machine
23	13	it over there and told me to go to Grade 3. And	23		THE WITNESS: (In English) On some machine.
24		I said	24	A.	and then you spray it on you spray that
25		COURT REPORTER: To where?	25		on
-			_		
1		206			208
1		THE WITNESS: Grade 3.	1		208 THE WITNESS: (In English) On top of Arby's.
1 2			1 2	A.	90 Page 1
- W		THE WITNESS: Grade 3.		A.	THE WITNESS: (In English) On top of Arby's.
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1		Yeah. I told him I'm high seniority and I	1		And then place them in the room.
2		pick up on my job in the morning, she just come	2		COURT REPORTER: And what them in the room?
3		up there so she can go over there. He didn't	3		MS. CALEM: They placed them in the room.
4		like me to say that.	4		COURT REPORTER: They placed them in the
5	Q.	Gary doesn't like to be argued with, right?	5		room, thank you.
6	A.	(In English without translation of question)	6	A.	That's where he send me to work.
7		No. I wasn't arguing. I was just telling	7	Q.	And what were you spraying if there was meat
8		him the truth, because we have to follow the	8		in the room, what were you spraying?
9		rules. Seniority is seniority and low seniority	9	A.	I was spraying I was spraying to those Arby's.
10		is low seniority.	10	Q.	Spraying the actual meat?
11	Q.	Well, is it possible that the brown helmet wasn't	11	A.	(In English without translation of question)
12	E.	able to do the other job for some reason?	12		Uh-huh.
13	A.	(In English without translation of question)	13	Q.	And you said there was it was black, whatever
14		Sure, she's grown woman.	14	£.	you sprayed was black?
15	Q.	She's what?	15	Α.	(In English without translation of question)
16	ν.	(Sotto voce discussion between witness and	16	м.	Like this (indicating).
17			17	Q.	And it got all over you?
18		interpreter,)	18	Α.	(In English without translation of question)
19		THE INTERPRETER: Let me explain the	19	Α.	
		question again because	20	0	Yep.
20		(Sotto voce discussion between witness and	21	Q.	And you were wearing your plastic and your
21		interpreter.)	22		goggles and your helmet, right?
22		THE INTERPRETER: She said she don't know if	2002-20	A.	(In English without translation of question)
23		that person was unable to do the job, because	23		You can't wear plastic on the helmet. You
24		what I know, if you come to the job, if you come	24	•	just put on top.
25		to the company, you come there to work, so.	25	Q.	Put the helmet.
		210		2	212
1	2.54	BY MS. CALEM:	1	A.	(In English without translation of question)
2	Q.	All right. Did you ask Gary why he was having	2		Uh-huh.
3		the brown helmet do your easy job and sending you	3	Q.	And Scott Genzler was doing it with you.
4		to do the other job?	4	A.	(In English without translation of question)
5	A.	I ask him and he said he answered that I say	5	_	Yes.
6		what I say, you have to do what I say.	6	Q.	Have you ever seen anybody else do this job?
7	Q.	So you asked him why	7	A.	(In English without translation of question)
8		THE WITNESS: (Response in Swahili.)	8		Like a woman?
9	Q.	Yes?	9	Q.	Anybody.
10		THE INTERPRETER: And he answered Yes.	10	A.	(In English without translation of question)
11		BY MS. CALEM:	11		Only men.
12	Q.	And he answered you just have to do what I say?	12	Q.	How do you know who's done the job if it's in a
1			13		
	A.	Yeah.	F000000		separate room?
200000000000000000000000000000000000000	A. Q.	Yeah. Okay. And then instead of taking the job he	14		THE INTERPRETER: She said sometime they
14 15			14 15		
200000000000000000000000000000000000000		Okay. And then instead of taking the job he	14 15 16		THE INTERPRETER: She said sometime they
15 16 17	Q. A.	Okay. And then instead of taking the job he wanted to assign you, he gave you another job	14 15 16 17		THE INTERPRETER: She said sometime they will see it while they go to on a break or sometime when they're waiting for more Arby's to go in, to go in the room, they will see them
15 16 17 18	Q. A.	Okay. And then instead of taking the job he wanted to assign you, he gave you another job where you had to spray black paint?	14 15 16 17 18		THE INTERPRETER: She said sometime they will see it while they go to on a break or sometime when they're waiting for more Arby's to
15 16 17 18 19	Q. A.	Okay. And then instead of taking the job he wanted to assign you, he gave you another job where you had to spray black paint? Yes. And it was in a room with, you said something about Arby's?	14 15 16 17 18 19		THE INTERPRETER: She said sometime they will see it while they go to on a break or sometime when they're waiting for more Arby's to go in, to go in the room, they will see them
15 16 17 18 19 20	Q. A.	Okay. And then instead of taking the job he wanted to assign you, he gave you another job where you had to spray black paint? Yes. And it was in a room with, you said something	14 15 16 17 18 19 20	Q.	THE INTERPRETER: She said sometime they will see it while they go to on a break or sometime when they're waiting for more Arby's to go in, to go in the room, they will see them coming out. That's how they
15 16 17 18 19	Q. A. Q.	Okay. And then instead of taking the job he wanted to assign you, he gave you another job where you had to spray black paint? Yes. And it was in a room with, you said something about Arby's?	14 15 16 17 18 19 20 21	Q. A.	THE INTERPRETER: She said sometime they will see it while they go to on a break or sometime when they're waiting for more Arby's to go in, to go in the room, they will see them coming out. That's how they BY MS. CALEM:
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15 16 17 18 19 20 21 22	Q. A. Q.	Okay. And then instead of taking the job he wanted to assign you, he gave you another job where you had to spray black paint? Yes. And it was in a room with, you said something about Arby's? After the meat are hanging on a On a tree, right?	14 15 16 17 18 19 20 21 22 23	A.	THE INTERPRETER: She said sometime they will see it while they go to on a break or sometime when they're waiting for more Arby's to go in, to go in the room, they will see them coming out. That's how they BY MS. CALEM: And you've only seen men do this? Yeah, only seen men do this.
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_		mithirela rooms, inc.	· -		
		213			215
1	Q.	Was Gary involved in the incident with Scott	1		Bend line if the Handy line, if they don't
2		Genzler?	2		have the ham, they bring Great Bend line to the
3	A.	He's a supervisor. He didn't want to have	3		production and work on the Handy line, so on that
4		anything to do but he knew because he was a	4		time we work on the Handy line.
5		supervisor.	5	Q.	You were on the Hand line?
6	Q.	But he was not involved in any of the activities	6	A.	(In English without translation of question)
7		that took place afterwards, right?	7		Yeah.
8	A.	Can you repeat again?	8	Q.	Okay. And he told you to put the nets on?
9	Q.	Yeah. I mean, you had a lot of meetings	9	A.	(In English without translation of question)
10		afterwards, after this incident, discussions in	10		Right.
11		the department. Gary was not part of that,	11	Q.	And you said, no, only men do that job; is that
12		right?	12		right?
13	A.	(In English without translation of question)	13	A.	(In English without translation of question)
14		No, but Scott Gonzales.	14		Yeah, because there's many job Grade 3, and
15	Q.	Everybody else. You just assumed Gary knew about	15		no woman, I never saw any woman do that job
16		the incident with Scott Genzler because that's a	16		except only me, he wanted me to do that job.
17		supervisor?	17	Q.	Okay. And did you do the job?
18	A.	(In English without translation of question).	18	A.	(In English without translation of question)
19		Yeah, he know everything.	19		No, I didn't do it. Because I didn't have a
20	Q.	Okay. And that happened one time in 2016,	20		choice, that's that day I learn, I asked Elda
21		correct?	21		because when they do, like, PT some production I
22	Α.	Yeah.	22		know, PT, they have some horn you can take, like,
23	Q.	Did it happen any other time?	23		a net and push it like this ((indicating) and
24		(In English without translation of question)	24		hands like this and it's kind of, like, easier,
25		Yeah. Another time he told me to put the	25		but when Great Bend line come, they remove
		Team. Thiodies came ne coad me co pas and			
		214			216
1		214	1		
	E	net Great Bend line net			216
1	Α.	214	1		216 they remove the the things.
1 2	Α.	214 net Great Bend line net COURT REPORTER: The what? The Great	1 2	10	they remove the the things. So that day I wasn't have a choice and I
1 2 3	Α.	214 net Great Bend line net COURT REPORTER: The what? The Great the Great Bend line net. And that was a Grade 3 again and I never see	1 2 3		216 they remove the the things. So that day I wasn't have a choice and I tell Elda, please, wait, let me try. So I tried
1 2 3 4 5	Α.	214 net Great Bend line net COURT REPORTER: The what? The Great the Great Bend line net. And that was a Grade 3 again and I never see any woman do that job. And I said why are you	1 2 3 4		they remove the the things. So that day I wasn't have a choice and I tell Elda, please, wait, let me try. So I tried that meat and I push it like that (indicating),
1 2 3 4 5 6	Α.	214 net Great Bend line net COURT REPORTER: The what? The Great the Great Bend line net. And that was a Grade 3 again and I never see any woman do that job. And I said why are you sending me over there to do that job, and I never	1 2 3 4 5		they remove the the things. So that day I wasn't have a choice and I tell Elda, please, wait, let me try. So I tried that meat and I push it like that (indicating), oh, it's easy. So I keep working that job because still now, still now they still do the
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4	217	1		219
1 No. II wasn't argue. II j		2		Gary keep yelling me, I think it was March what, when I got a suspending. It was ten days
2 Gary — and I ask him, I said,		3		
3 do this to me? II am a woman a	1970			of suspending. It was in the morning, because to
4 job. You have too much mens h		4		fight for my high seniority right, that job I
5 call the one man. He said, Is	said what I said	5		was because he said that Scott Reed says if
6 and you have to do whatever I	say. So I was,	6		you pick a job on Mondays, it's your job the
7 like, this is kind of like may	be they want to	7		whole week. And that job was already worked
8 fire me because I didn't want	to work to do this	8		worked like five weeks.
9 job, because last time he did	that and I said no,	9		Oh, I'm sorry, I take your job.
10 he put me somewhere else. No,	I don't want to go	10		THE INTERPRETER: Go ahead.
11 somewhere like that. And my m	ind told me, try to	11		THE WITNESS: (In English) No. Let me
12 put the net like this. So whe	n I put it like	12		let me tell him.
13 this, and I told Elda, try it	and see how it's	13		(Sotto voce discussion between witness and
14 going to come, when she tried,	oh, my gosh, it	14		interpreter.)
15 was good and now they take tha	t idea. Even a	15	A.	On this job was this incident, so Gary in the
16 woman can do that job for them	now.	16		morning, he said, if you have senility [sic]
17 But Great Bend line, no.	It's only for men	17	Q.	Seniority.
18 because something big like thi	s (indicating), and	18	A.	seniority stature, you you have a right to
19 when you put it like this (ind	icating), it hurt.	19		pick any job on Monday morning in the morning,
20 You might be feel this (indica	ting) hurt, your	20		and if you pick that job, you have a right to do
21 nail, it's a hard job.		21		it same job the whole week. Because it was open
22 Q. So you're saying putting sock	ks on the Great Bend	22		work, I was on that job for five weeks. I don't
23 line is hard?		23		know it happened or how Gary work up. He came
24 A. (In English without translatio	n of question).	24		and brought somebody who only for a month in the
25 It is.		25		company to replace me at that position.
	218			220
1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2				
1 Q. Okay. And you were actually	you did it on the	1	Q.	Who was that person?
<pre>1 Q. Okay. And you were actually 2 Hand line that day?</pre>	you did it on the	1 2	Q. A.	Who was that person? (In English without translation of question)
	20.40.00		NATIO.	AND THE PROPERTY OF THE PROPER
2 Hand line that day?	20.40.00	2	NATIO.	(In English without translation of question)
2 Hand line that day? 3 A. (In English without translation	n of question)	2	NATIO.	(In English without translation of question) I'm sorry, I remember. It was Lorena. She
2 Hand line that day? 3 A. (In English without translatio 4 Huh?	n of question) o and you said it was	2 3 4	NATIO.	(In English without translation of question) I'm sorry, I remember. It was Lorena. She had her own job, her own assigned job, so she
2 Hand line that day? 3 A. (In English without translatio 4 Huh? 5 Q. When you actually did the job	n of question) o and you said it was ine?	2 3 4 5	NATIO.	(In English without translation of question) I'm sorry, I remember. It was Lorena. She had her own job, her own assigned job, so she took me to work at Grade he took me to work at
2 Hand line that day? 3 A. (In English without translatio 4 Huh? 5 Q. When you actually did the job 6 easy, that was on the Hand 1:	n of question) o and you said it was ine?	2 3 4 5 6	NATIO.	(In English without translation of question) I'm sorry, I remember. It was Lorena. She had her own job, her own assigned job, so she took me to work at Grade he took me to work at Grade 3 and took Lorena on her job to come pick
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2 Hand line that day? 3 A. (In English without translatio 4 Huh? 5 Q. When you actually did the job 6 easy, that was on the Hand 1: 7 A. (In English without translatio 8	on of question) on and you said it was ine? on of question) time in 2016?	2 3 4 5 6 7 8	NATIO.	(In English without translation of question) I'm sorry, I remember. It was Lorena. She had her own job, her own assigned job, so she took me to work at Grade he took me to work at Grade 3 and took Lorena on her job to come pick up on my job. I know Lorena, she's high seniority but she have her own job, assigned job.
2 Hand line that day? 3 A. (In English without translatio 4 Huh? 5 Q. When you actually did the job 6 easy, that was on the Hand 1: 7 A. (In English without translatio 8 Yes. 9 Q. All right. And this was one	on of question) o and you said it was ine? of question) time in 2016? on of question)	2 3 4 5 6 7 8 9	NATIO.	(In English without translation of question) I'm sorry, I remember. It was Lorena. She had her own job, her own assigned job, so she took me to work at Grade — he took me to work at Grade 3 and took Lorena on her job to come pick up on my job. I know Lorena, she's high seniority but she have her own job, assigned job. So I was, like, why he took somebody on her job
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		221			223
1		He asked me which job you want to do, and I said	1		don't think that is true because there were
2		the one you give to me, my job. He said, no, no,	2		people working on that lane.
3		no, you have to go work over there. So he was	3	Q.	Well, according to the notes of many different
4		close to me yelling at me like, just like	4		people, the deli line was down so there were four
5		(indicating) almost touch my lips. And I say,	5		extra workers and they came over to smoked meat
6		why you harass me like that? This is morning.	6		wash and that's why Lorena bumped you because she
77		We don't even go to line. Why you harass me like	7		had more seniority, she got to pick her job.
83		that? And he took me to personnel office.	8	A.	Lorena said she was sent by Gary.
100.00	Q.	Didn't you call him racist?	9	Q.	Well, four extra workers were sent by Gary; isn't
	A.	(In English without translation of question)	10		that right?
111		No. IThey twist harassment and harass and	11	A.	I don't know. The only person that I know is
112		racist because I'm broken English, then they	12		Lorena.
113		twist it and they believe it.	13	Q.	All right. And then Gary asked you to pick
11 (63	œ.	Oh, so he thought you called him racist but you	14	-	another job, right?
115	E.	were saying, why are you harassing me?	15	Α.	He told me to go to work on Handy line and I
THE RESERVE OF THE PERSON NAMED IN	A.	(In English without translation of question)	16		went.
117	77.	Yes.	17	Q.	Well, didn't he first ask you to pick another job
	Q.	Okay. And that was a Monday, wasn't it, on	18	ν.	and you refused to pick one?
119	ν.	December 5th?	19	Α.	So on that on that day, he told he told
2027	A.		20	м.	THE WITNESS: (In English) She.
And the second	1	That was on Monday? It was December?	21	A.	she told Lori [sic] to to come take my
	Q.	Monday, December 5th, 2016. Maybe Here's your	22	А.	my spot and send me to the third degree
22		grievance. You filed a grievance over this,	23		
23	uu a	right?		70	THE WITNESS: (In English) Grade 3.
	A.	Let me see.	24	A.	Grade 3 lane.
25		MS. CALEM: Mark that next in order.	25	-	THE WITNESS: (In English) To ham.
١.,		222			224
1		govern nanonana o	-4	70	to hom. I refused not to so there heavise I
1 2		COURT REPORTER: Can we take a rest room	1	A.	to ham. I refused not to go there because I
2		break here in a bit?	2	A.	had seniority compared to other employees who
3		break here in a bit? MS. CALEM: Why don't we take a break right	2 3	A.	had seniority compared to other employees who were there who were there. So I told him he
3 4		break here in a bit? MS. CALEM: Why don't we take a break right after you mark that.	2 3 4	A.	had seniority compared to other employees who were there who were there. So I told him he should send us less that have less seniority
3 4 5		break here in a bit? MS. CALEM: Why don't we take a break right after you mark that. (Naambwe Deposition Exhibit 23 marked.)	2 3 4 5		had seniority compared to other employees who were there who were there. So I told him he should send us less that have less seniority than I to go there instead of me.
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		225			227
1	Q.	Right. But first Gary was asking you to pick	1		way to fire me.
2		another open job, wasn't he?	2		BY MS. CALEM:
3	Α.	And he came he said when he came, he said	3	Q.	Are you aware that there are three people who
4		go do the Grade 3 job and I will have Lorena do	4		heard you use the word "racist"?
5		your job. And I told him, no, you got to go call	5	A.	When I went down there, when they call me, they
6		those two men who have a low seniority than I to	6		say, they asked Thomas Zuroff where those other
7		do the job.	7		two people came from, if you say three people
8	Q.	All right. The other two people who had less	8		heard heard me call him racist.
9	۷.	seniority than you were sent to work on the Great	9	Q.	I'm just asking, are you aware that other people
10		Bend Hand line but you don't like to work on that	10	χ.	heard you use the word "racist"?
11		line, right? Because Juan is there.	11	Α.	It was in the morning so those those people, I
12	Α.	Yeah. That job is only for one person period.	12		don't know about them because it was in the
13	Q.	All right. So in any event Well, let me ask	13		morning. It was I and Gary and Thomas, that they
14	Q.		14		came to me at a place where I was changing,
15	83	you this: Do you remember that production was	15		putting on the work gear so they the ones who
16		stopped for seven seven or eight minutes because of this conflict that you were having?	16		were there. So you said the other people heard
17			17		us so I don't know if that's something they made
18	A.	I don't know that.	18		up, you know, their opposition towards me.
2007001 10	Q.	And you were written up for arguing with Gary?	19	Q.	Did you tell Gary he treats you like a slave?
19	A.	On that day, I was I they didn't notify me	20		ACCOUNT TO THE CONTRACT CONTRA
20		of anything, but the next day, that's when I	200	Α.	Yes, I told him.
21		received this notification for suspension	21	Q.	On that day?
22		suspense suspension of	22	A.	Yes.
23		THE WITNESS: (In English) Suspended.	23	Q.	And you did that on the line in front of
24	A.	suspended for ten days.	24		everybody?
25	Q.	Okay. So your ten-day suspension, some of it was	25	Α.	It was on that day when he came yelling at me,
	Q.	226		Α.	228
1		226 for absenteeism, right?	1	A.	228 Like, face to face where he came close to my
1 2	Q.	226 for absenteeism, right? Yes, it was part of it was attendance, but	1 2	Α.	like, face to face where he came close to my to my face. Even his saliva was, you know,
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1		Right.	1		a grievance about that, right? This was in
2	Q.	Okay. And did you explain it was not gum?	2		August.
3	A.	(In English without translation of question)	3	A.	I didn't report The one that you have is the
4		Yeah. And I show Scott, I show him what I	4		one that I they kept doing it, but I did not
5		was having in my pocket.	5		report every incident but they kept doing it.
6	Q.	All right. Now, you're saying that Gary is doing	6	Q.	All right. So on August 22, 2016, you reported
7		this so that you will quit. Why do you think	7	-	that you were on Arby's by yourself?
8	12	that?	8	A.	(In English without translation of question)
9	Α.	I feel this already because he treated me	9		Yeah.
10	13	differently than the other employees. It looks	10	Q.	And you're saying that happened on other
11	E	like the other employees are just okay to him but	11		occasions?
12	I	I am the one who always get picking on.	12	A.	(In English without translation of question)
13	Q.	You feel he picks on you?	13		Yeah.
14	Α.	Yes.	14	Q.	And when did it happen?
15	Q.	And do you know why he picks on you?	15	Α.	It continues like throughout throughout 2016
16	A.	I don't know why.	16	E	and 2017. Even there was an incident happen in
17	Q.	All right. What else happened that was	17		April where it was me and Yvette working on this
18		retaliatory?	18		job and then one of the employee
19	A.	First of all, if I ask for hurt [sic], like, you	19		Employee, right?
20		know, someone someone to come hurt me, they	20		THE WITNESS: (In English) No. Lisa, she's
21		never give me anybody to come hurt me out so I'm	21		team leader.
22		always	22	A.	Lisa said that we are working faster compared
23	Q.	To help you?	23		to
24		THE INTERPRETER: Yes.	24		THE WITNESS: (In English) Hold on. Let me
25	A.	I'm always there by myself.	25		help.
		230			232
1	Q.	Okay. When do you ask for help and not get it?	1		So in April, me and Yvette was working ribs
2	A.	I was I was very tired on I don't remember	2		so we was working how we supposed to be working.
3		exactly month or year, 2001	3		Then the next day, Lisa, she came when I was
4		THE WITNESS: (In English) No. 2016.	4		when I was having hooks, we want to work again so
5		THE INTERPRETER: Oh, 2016.	5		first he came, he told me, Sala, can you go to
6		but I don't remember month. I was tired	6		Handy line to dig half and I said, okay, fine
7		of being treated like that. Then I asked someone	7		COURT REPORTER: To dig to dig what?
8		to take a picture, like a like a like a	8		THE WITNESS: Meat, half it's smaller
9		testimony or witness if they if they refused	9		meat that they mix with the big meat and they
10		all they they disagreed that they don't	10		work together.
11		they don't put me on the line by myself so I can	11		So I said, Okay, so I went there. So her, I
12		show people, whoever, or my lawyer, whoever, that	12		think that she she cried to Lisa and said, why
13		it is true that I am there by myself.	13		am I be working by myself, and she said, yeah,
14	Q.	So you're saying you're working on an entire line	14		first I saw you Sala yesterday, you all working
15		by yourself?	15		too fast and too much. So he doesn't want to see
16	A.	It's two jobs. When when it comes the ribs,	16		too much meat on the table like that so that's
17		they were put they put they were putting me	17		why she separate you and Sala so you can't work
18		on by myself. When it comes to ribs, and there	18		on the same vats.
19		was	19		But the next day, it was four people on the
20		What else was there?	20		tree working same job. I was, like, why? So
21		THE WITNESS: (In English) Arby's.	21		we're not supposed to two people here, but the
22	A.	Arby's, they put me there, they put me by	22		next day it was Wally and Becky on the same vats
23		myself over there.	23		working.
24 25	Q.	Okay. So we talked about the one time that you	24	Q.	Who is it who told you that you and Yvette have worked too fast and so they were going to

		archirecta rooms, rice.	_		
		233			235
1		separate you?	1		It might be 10, 220.
2	A.	(In English without translation of question).	2	Q.	Ten to 20 times?
3		Lisa, she told that. Foos, he told her	3	A.	(In English without translation of question)
4		that.	4		I never counted. That's why that day I got
5	Q.	Lisa said who?	5		mad to do that every time by myself and I I
6	A.	(In English without translation of question)	6		take pictures working by myself.
7		Foos.	7	Q.	And that's the picture we don't have?
8	Q.	Who's Foos?	8	A.	(In English without translation of question)
9	A.	(In English without translation of question)	9		You do. You do have.
10		The first name is Robert, Robert, Rob.	10	Q.	You said there were two that Okay.
11	Q.	Robert Foos?	11	A.	(In English without translation of question)
12	A.	(In English without translation of question)	12		No. You do have it.
13		Yeah, Foos.	13	Q.	We have that one in the pictures?
14	Q.	And he's the new supervisor?	14	A.	(In English without translation of question)
15	A.	(In English without translation of question)	15		Yeah.
16		Yes.	16	Q.	All right. So the pictures are Exhibit 12 from
17	Q.	So Lisa said Robert said you were working too	17	7 ± 25 033	yesterday, so why don't you show me which picture
18		fast so we're going to separate you?	18		shows you working by yourself.
19	A.	(In English without translation of question)	19	A.	(In English without translation of question)
20		Yeah, because he don't want to see a lot of	20		This one (indicating).
21		meat on the table and that's how all of us work	21	Q.	Okay. This is on page 248, and this shows I
22		all the time.	22		see two people in this picture. Which one is
23	Q.	All right. And then in 2016, how many times were	23		you?
24	~	you assigned to work by yourself in Arby's?	24	A.	(In English without translation of question)
25	Δ	(In English without translation of question)	25		That's three people. Let me show That
20	- ·	(In English without clansiation of question)			inde a chiec people, 200 me onem
2.5	Α,	234			236
1	Α,		1		Shorter -
	Q.	234			236
1	28	234 I don't have it to a count because	1		236 person you see on, like, on the cloth, he was
1 2	28	I don't have it to a count because Can you give me an estimate? Is it 10 times?	1 2		236 person you see on, like, on the cloth, he was ready to put the clothes on it. That's Lamar.
1 2 3	Q.	I don't have it to a count because Can you give me an estimate? Is it 10 times? 100 times? Five times?	1 2 3		person you see on, like, on the cloth, he was ready to put the clothes on it. That's Lamar. And it was Lamar and Abdallah. They was on the
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1 2 3 4 5 6 7 8 9	Q. A.	I don't have it to a count because Can you give me an estimate? Is it 10 times? 100 times? Five times? (In English without translation of question) No, no 100 times. It might be even 20, 30 by myself. Twenty or 30 times?	1 2 3 4 5 6 7 8	A.	person you see on, like, on the cloth, he was ready to put the clothes on it. That's Lamar. And it was Lamar and Abdallah. They was on the tree. So I was put the meat on the table for two men by myself. Okay. Are you in this picture? (In English without translation of question) Yes.
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1 2 3 4 5 6 7 8 9 10 11	Q. A.	I don't have it to a count because Can you give me an estimate? Is it 10 times? 100 times? Five times? (In English without translation of question) No, no 100 times. It might be even 20, 30 by myself. Twenty or 30 times? (In English without translation of question) Yeah, I don't I don't want to argue with them. Whatever I said why, I don't need the help, they say you don't need the help? And the	1 2 3 4 5 6 7 8 9 10	А. Q. А.	person you see on, like, on the cloth, he was ready to put the clothes on it. That's Lamar. And it was Lamar and Abdallah. They was on the tree. So I was put the meat on the table for two men by myself. Okay. Are you in this picture? (In English without translation of question) Yes. Which one is (In English without translation of question) You don't see me?
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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A. Q. A.	I don't have it to a count because Can you give me an estimate? Is it 10 times? 100 times? Five times? (In English without translation of question) No, no 100 times. It might be even 20, 30 by myself. Twenty or 30 times? (In English without translation of question) Yeah, I don't I don't want to argue with them. Whatever I said why, I don't need the help, they say you don't need the help? And the woman said I arguing with them I don't want to do a job. When I ask them for help, the woman say I'm arguing with them, I don't want to do job. So it's your testimony that in 2016 you worked on Arby's 20 times by yourself? (In English without translation of question)	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Q. A. Q. A.	person you see on, like, on the cloth, he was ready to put the clothes on it. That's Lamar. And it was Lamar and Abdallah. They was on the tree. So I was put the meat on the table for two men by myself. Okay. Are you in this picture? (In English without translation of question) Yes. Which one is (In English without translation of question) You don't see me? Which one is you? (In English without translation of question) Let me see. This is me (indicating). MS. POCHOP: Mark can she mark on it? MS. CALEM: Yeah.
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		mithilela roods, inc.			May 24, 2010
		241	1407		243
1	A.	No.	1		Yeah.
2	Q.	And, again, for business theft and other reasons,	2	Q.	And you, in fact, were eating lunch in the pickle
3		it's against the rules to take a photograph on	3		room with Tom Anderson, weren't you?
4		the production floor, isn't it?	4	A.	(In English without translation of question)
5	A.	(In English without translation of question)	5		No, that's not true.
6		Well, other people take picture. They take	6		Okay. So after Scott Reed say nobody get
7	E	a picture, Lisa, Gary, Rusty, all the employees,	7		inside of this room but they let her, Amanda, to
8	B	they have people take a picture. Even they have	8		put the whole equipment in that house in that
9	E	a cake on the plant, they can take a picture for	9		room, and after work she can put the whole
10	E	happy birthday for people	10		equipment in that room, and in the morning she
11	Q.	II'm just asking you, it's against the rules,	11		had to get inside of the equipment [sic] and get
12	E	isn't it?	12		the equipment. That's why when she was get
13	A.	(In English without translation of question)	13		inside, I took this picture, and when she came
14		I didn't know because I see supervisor doing	14		out where's the other one?
15	e	and employee, they do the same thing because the	15	Q.	On page 243 there's another picture of the pickle
16		supervisor they know the rules and they doing it	16		room.
17		on the employee face, so we thought maybe you can	17	A.	(In English without translation of question)
18	- 6	do that because supervisor, they do the same	18		Yeah, right here. She was coming out.
19	B	thing, and team leader.	19	Q.	Okay. So she's putting her equipment in there
20	Q.	All right. So let's go through this Exhibit 12	20	A.	(In English without translation of question)
21		and tell me which picture you took and what they	21		Yes.
22		show.	22	Q.	and then she's coming out?
23	A.	(In English without translation of question)	23	A.	(In English without translation of question)
24		Okay. After all of this, this picture I	24		Right
25		took (indicating)	25	Q.	Okay.
		242			244
1	Q.	You can scan well, we're just talking about	1	A.	244 so I was, like, because I went to, when I go
1 2	Q.		1 2	A.	CARROLLES AND
	Q.	You can scan well, we're just talking about	9550	Α.	so I was, like, because I went to, when I go
2		You can scan well, we're just talking about the first page of Exhibit 12.	2	A.	so I was, like, because I went to, when I go to report to union representative, if I needed
2		You can scan well, we're just talking about the first page of Exhibit 12. (In English without translation of question)	2	A.	so I was, like, because I went to, when I go to report to union representative, if I needed BJ, I go to call tell him, please, can you
2 3 4	A.	You can scan well, we're just talking about the first page of Exhibit 12. (In English without translation of question) This one?	2 3 4	Α.	so I was, like, because I went to, when I go to report to union representative, if I needed BJ, I go to call tell him, please, can you call BJ for me and BJ will come so they didn't
2 3 4 5	A. Q.	You can scan well, we're just talking about the first page of Exhibit 12. (In English without translation of question) This one? Yes.	2 3 4 5	A. Q.	so I was, like, because I went to, when I go to report to union representative, if I needed BJ, I go to call tell him, please, can you call BJ for me and BJ will come so they didn't like that so Scott Reed put this on.
2 3 4 5 6	A. Q.	You can scan — well, we're just talking about the first page of Exhibit 12. (In English without translation of question) This one? Yes. (In English without translation)	2 3 4 5 6	377949	so I was, like, because I went to, when I go to report to union representative, if I needed BJ, I go to call tell him, please, can you call BJ for me and BJ will come so they didn't like that so Scott Reed put this on. COURT REPORTER: Can you say that
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A. A.	You can scan — well, we're just talking about the first page of Exhibit 12. (In English without translation of question) This one? Yes. (In English without translation) Okay. I took this picture because when something happened in that department, if Tom Zuroff is not there, because even if you tell Tom Zuroff, he never go to office and say something. But I used to go here and to call Thomas here, say, can you please come. So they —— I don't know if it's Lisa or Rusty, I don't know which one, went to Scott Reed and say Sala, she (unintelligible) — COURT REPORTER: You went to Scott Reed and said what? I don't know who went to tell Scott Reed that Sala was in this room and in this room, so Scott Reed, he said no one will get inside that (intelligible) room again and they put this —— COURT REPORTER: What room? Maybe I need	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q.	to report to union representative, if I needed BJ, I go to call — tell him, please, can you call BJ for me and BJ will come so they didn't like that so Scott Reed put this on. COURT REPORTER: Can you say that — You have to just speak more slowly. Tell her again slowly. COURT REPORTER: When I talked to BJ. (Witness continues in English) Oh, yeah. When something happened in the — like if they harass me, making me walk by myself, so I will go over there, that's where he work, and tell him, please, can you call BJ for me so he can come to be a witness. And when they tell Scott Reed that I go in this room, eat in this room, stay in this room, so Scott Reed, he said nobody who would get into this room except only the employees that are the position. So after they did that to me, they allowed this woman to put the whole equipment in this room, and after work in morning but nothing happen to her. They didn't tell her anything.

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1		why these people were there? If they had	1		interpreter.)
2		permission, why can't they give all employees	2	A.	OZ took my picture, and then Scott Rusty, he
3		permission to have food or chew gums?	3		was not permitted to be in this department but he
4		BY MS. CALEM:	4		was coming all the time. Then I decided to take
5	Q.	Okay. Do you know the occasion for this party?	5		a picture like proof that Rusty is there.
6	2.	Do you know what the occasion was for this party?	6	Q.	Your position is Russ was not permitted to come
7	A.	I don't know. The only thing I know is in the	7	-	in the department?
8	•••	department.	8	A.	(In English without translation of question)
9	0	Okay. So this is significant Okay. Is the	9		Right. He was a transfer to another
10	Q.		10		department.
11	70	label room a production area?	11	Q.	So that means he can never step foot in his old
12	A.	That is like a where they the production of	12	۷.	department?
	_	equipment.	20220	Α.	0.9 × 0.01 € 0.8 ± 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.00 × 0.0
13	Q.	There's no raw meat in the label room, is there?	222000000000000000000000000000000000000	Α.	(In English without translation of question)
14	A.	It's just No, there is no meat. It's just	14	_	That's what I heard.
15		some equipment they use to pack the meat.	15	Q.	And is this a picture of Russ?
16	Q.	Okay. So in your mind, this picture is	16	Α.	(In English without translation of question)
17		significant because people are having a party but	17		Yes.
18		you were in trouble for chewing gum; is that	18	Q.	Okay. Is he the one wearing the blue hat?
19		right?	19	A.	(In English without translation of question)
20		THE INTERPRETER: So I'm going to clarify	20		Yes.
21		again to her because I'm she is said I wasn't	21	Q.	And he's in Department 19?
22		chewing gum, they disciplined me with	22	A.	(In English without translation of question)
23	Q.	They disciplined you for chewing gum?	23		Right.
24		THE INTERPRETER: But I wasn't I wasn't	24	Q.	And where are you?
25		chewing gum.	25	A.	(In English without translation of question)
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1	Q.	Right. I understand that. I'm just trying to	1		I was on the Honey line.
2		figure out the reason this picture is important	2	Q.	In Department 19?
3		START PROPERTY AS A CONTRACTOR PROPERTY AND A CONTRACTOR	3	70 100	
, ×		to you is because you're saying they're having	3	Α.	(In English without translation of question)
4		parties but they're still not letting people chew	4	Α.	(In English without translation of question) Right.
100				Q.	
4	A.	parties but they're still not letting people chew	4		Right.
4 5	A.	parties but they're still not letting people chew gum. Is that it?	4 5		Okay. So you saw Russ in Department 19 and you
4 5 6	A.	parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason	4 5 6	Q.	Okay. So you saw Russ in Department 19 and you decided to take his picture?
4 5 6 7	Α.	parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason because I feel like they they treated me	4 5 6 7	Q.	Okay. So you saw Russ in Department 19 and you decided to take his picture? (In English without translation of question)
4 5 6 7 8	A. Q.	parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason because I feel like they they treated me differently differently compared to other	4 5 6 7 8	Q. A.	Okay. So you saw Russ in Department 19 and you decided to take his picture? (In English without translation of question) Right.
4 5 6 7 8 9		parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason because I feel like they they treated me differently differently compared to other people.	4 5 6 7 8 9	Q. A.	Okay. So you saw Russ in Department 19 and you decided to take his picture? (In English without translation of question) Right. Okay. And Russ was transferred to another
4 5 6 7 8 9		parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason because I feel like they they treated me differently differently compared to other people. Okay. And the next picture on page 245 we know	4 5 6 7 8 9	Q. A.	Okay. So you saw Russ in Department 19 and you decided to take his picture? (In English without translation of question) Right. Okay. And Russ was transferred to another department after the incident where he tapped you
4 5 6 7 8 9 10		parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason because I feel like they — they treated me differently — differently compared to other people. Okay. And the next picture on page 245 we know that Yvette took. We talked about that	4 5 6 7 8 9 10	Q. Α. Q.	Okay. So you saw Russ in Department 19 and you decided to take his picture? (In English without translation of question) Right. Okay. And Russ was transferred to another department after the incident where he tapped you on the shoulder, right?
4 5 6 7 8 9 10 11 12	Q.	parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason because I feel like they — they treated me differently — differently compared to other people. Okay. And the next picture on page 245 we know that Yvette took. We talked about that yesterday. What about on page 246?	4 5 6 7 8 9 10 11 12	Q. Α. Q.	Okay. So you saw Russ in Department 19 and you decided to take his picture? (In English without translation of question) Right. Okay. And Russ was transferred to another department after the incident where he tapped you on the shoulder, right? (In English without translation of question)
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A.	parties but they're still not letting people chew gum. Is that it? Yeah, that is the reason, the whole reason because I feel like they — they treated me differently — differently compared to other people. Okay. And the next picture on page 245 we know that Yvette took. We talked about that yesterday. What about on page 246? This picture is significant because OZ — THE WITNESS: When OZ took a picture on iPad — When OZ took a picture of mine in his iPad, he didn't get any trouble, any — any verbal warnings. THE WITNESS: (In English) No. THE INTERPRETER: Any trouble, right?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. A.	Okay. So you saw Russ in Department 19 and you decided to take his picture? (In English without translation of question) Right. Okay. And Russ was transferred to another department after the incident where he tapped you on the shoulder, right? (In English without translation of question) And spill water on my face. Oh, the shoulder, I think he got a suspending or something like that — Okay. — I think. And he went home one day, the next day he come back. So I don't know what happened. I don't know — Okay. So on one incident he tapped you on the
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	Difference 2 0000 / 2110.			ore .
	253	l		255
1	thought that Tom Anderson had bid out of the	1		like, out that place because it's tight place,
2	department, right?	2		it's a little tight, so.
3	A. (In English without translation of question)	3		I think I take a picture. It's not here?
4	Yeah, that sowhat he came to tell me. He	4		It's not here. I seen I have picture.
5	poked me on my shoulder like (indicating) and I	5	Q.	Yeah. So on that day, the Honey line was down,
6	was scared. And I look back, I'm, like,	6		right?
7	(indicating) and, yeah, I want to ask you, how	7	A.	(In English without translation of question)
8	you going to do now because your partner is	8		It wasn't down. The the line tree, it
9	leaving, and I said, my partner is Jesus.	9		wasn't broken down so we replace to next line.
10	Q. Okay. Okay. And com you made a complaint	10	Q.	Right. So it had to be fixed?
11	about that, right?	11	A.	(In English without translation of question)
12	A. (In English without translation of question)	12		Yeah.
13	Right. Because it hurt me.	13	Q.	And after the mechanics or maintenance finished
14	Q. Because he poked you on the shoulder?	14		fixing it, Russ was spraying down that that
15	A. (In English without translation of question)	15		line, wasn't he?
16	Yeah.	16	A.	(In English without translation of question)
17	Q. And he was suspended for that, right?	17		Uh-huh.
18	A. (In English without translation of question)	18	Q.	Yes?
19	That's what I heard about.	19	A.	(In English without translation of question)
20	Q. Okay.	20		Yes.
21	A. I don't know.	21	Q.	And that's when he got and you Abigail wet,
22	Q. All right. And then on another occasion, he was	22		right?
23	cleaning one of the lines and he sprayed water on	23	A.	(In English without translation of question)
24	you and Abigail, right?	24		Right.
	A. (In English without translation of question)	25	Q.	Okay. And he did not apologize?
<u> </u>	254			256
1	254	1	Α.	(In English without translation of guestion)
1	Right.	1 2	A.	(In English without translation of question)
2	Right. Q. Okay. And Abigail yelled at him, hey, you're	2		(In English without translation of question) No.
2 3	<pre>Right. Q. Okay. And Abigail yelled at him, hey, you're you're getting us wet, right?</pre>	2	A. Q.	(In English without translation of question) No. And then later that day, he was setting up the
2 3 4	Right. Q. Okay. And Abigail yelled at him, hey, you're you're getting us wet, right? A. (In English without translation of question)	2 3 4	Q.	(In English without translation of question) No. And then later that day, he was setting up the sock again on the Honey line, right?
2 3 4 5	Right. Q. Okay. And Abigail yelled at him, hey, you're you're getting us wet, right? A. (In English without translation of question) Right.	2 3 4 5		(In English without translation of question) No. And then later that day, he was setting up the sock again on the Honey line, right? (In English without translation of question)
2 3 4 5 6	Right. Q. Okay. And Abigail yelled at him, hey, you're you're getting us wet, right? A. (In English without translation of question) Right. Q. Okay. And you were angry that he sprayed water	2 3 4 5 6	Q. A.	(In English without translation of question) No. And then later that day, he was setting up the sock again on the Honey line, right? (In English without translation of question) Who?
2 3 4 5 6 7	Right. Q. Okay. And Abigail yelled at him, hey, you're you're getting us wet, right? A. (In English without translation of question) Right. Q. Okay. And you were angry that he sprayed water on you and he didn't apologize, right?	2 3 4 5 6 7	Q. A. Q.	(In English without translation of question) No. And then later that day, he was setting up the sock again on the Honey line, right? (In English without translation of question) Who? Russ. No?
2 3 4 5 6 7 8	Right. Q. Okay. And Abigail yelled at him, hey, you're you're getting us wet, right? A. (In English without translation of question) Right. Q. Okay. And you were angry that he sprayed water on you and he didn't apologize, right? A. (In English without translation of question)	2 3 4 5 6 7 8	Q. A. Q. A.	(In English without translation of question) No. And then later that day, he was setting up the sock again on the Honey line, right? (In English without translation of question) Who? Russ. No? No.
2 3 4 5 6 7 8 9	Right. Q. Okay. And Abigail yelled at him, hey, you're you're getting us wet, right? A. (In English without translation of question) Right. Q. Okay. And you were angry that he sprayed water on you and he didn't apologize, right? A. (In English without translation of question) I didn't say anything, but when he come down	2 3 4 5 6 7 8 9	Q. A. Q.	(In English without translation of question) No. And then later that day, he was setting up the sock again on the Honey line, right? (In English without translation of question) Who? Russ. No? No. Okay. So let's just look at this picture.
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1		257			259
1		THE WITNESS: Yes.	1	A.	(In English without translation of question)
2	Q.	He did not say excuse me?	2		Yes.
3	A.	(In English without translation of question)	3	Q.	Okay. Did he did he touch you with his hands?
4		No.	4	A. [(In English without translation of question)
5	Q.	And you were so where it says Sala with a	5		No. Conly the lap.
6		little star, that's where you were standing,	6	Q.	Okay. So his lap touched your behind?
7		right?	7	A. [(In English without translation of question)
8	Α.	(In English without translation of question)	8	1000	Yeah, my booty.
9	15/5/41	No. This is on the end. I was I was,	9	Q.	Okay. And that made you angry?
10		like, in the middle.	10	A.	(In English without translation of question)
11	Q.	Okay. So he was All right. There's a star	11		Yeah, I was I was, like, why he feeling
12	z.	here in the corner, says Russ is standing in this	12	- 313	mmy my booty like that. It making me mad.
13		area when washing the line, but in between these	13	Q.	So you think he was intentionally trying to feel
14		two machines you were standing and Abigail was	14	2.	you?
15		standing and he went by you, right?	15	Α.	(In English without translation of question)
16	A.	The state of the s	16	А.	Begause he supposed to say excuse me and it
17	Α,	(In English without translation of question)	17		
	^	You want me to show you?	18	- (2.5	was too many ways that he supposed to pass by to
18	Q.	Sure. If you want to show me.	(0000) V00000	110	go another the way he want to go, so why he
19		(In English without translation of question)	19	0	came like here and you don't even say excuse me.
20	A.	Yeah. Here, this is star over here, that's where	20	Q.	So you thought he did it intentionally?
21		Yvette that she was clipping and she was show	21	A.	(In English without translation of question)
22		face that way, like I would show you, and usually	22		Yes.
23		he was here with the put the net on the horn.	23	Ω.	Okay. And do you know if Russ was disciplined
24		So and that time Abigail, he was wiping her face	24	FW	for this?
25		but he was out here a little bit. So this table	25	Α.	(In English without translation of question)
١.		258			260
1		you see over here, it was here on the middle, we	1		I know they transfer him from his
2		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a	2	1	I know they transfer him from his department, but Scott already told me, I have no
2 3		you see over here, it was here on the middle, we	2	0 E	I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go.
2 3 4	Q.	you see over here, it was here on the middle, we put the socks on it, so it was kind of like a	2 3 4	Ω.	I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay.
2 3 4 5	Q. A.	you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question).	2 3 4 5	Q. A.	I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told
2 3 4 5 6		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space?	2 3 4		I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him
2 3 4 5 6 7		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question).	2 3 4 5 6 7		I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told
2 3 4 5 6 7 8		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the	2 3 4 5 6 7 8		I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he
2 3 4 5 6 7 8 9		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe	2 3 4 5 6 7 8 9		I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a
2 3 4 5 6 7 8 9		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe the's coming to say, I'm sorry, I did on mistake,	2 3 4 5 6 7 8 9		I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he
2 3 4 5 6 7 8 9 10		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe the socks. It was a tight space? The socks of the socks of the socks of the socks. So when the rest come, I thought maybe the socks of the s	2 3 4 5 6 7 8 9 10		department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everywhere he wanted to go because
2 3 4 5 6 7 8 9 10 11		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe he's coming to say, I'm sorry, I did on mistake, but he didn't do that. He just come close to us and come to mellike (indicating). So this one	2 3 4 5 6 7 8 9 10 11 12	A	department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everywhere he wanted to go because he's a supervisor.
2 3 4 5 6 7 8 9 10 11 12 13		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe he's coming to say, I'm sorry, I did on mistake, but he didn't do that. He just come close to us and come to me like (indicating). So this one with my booty, we was just touch each other and	2 3 4 5 6 7 8 9 10	A	I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everyone he everywhere he wanted to go because he's a supervisor. Okay. Now, didn't Abigail say Well, let's
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2 3 4 5 6 7 8 9 10 11 12 13		you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe he's coming to say, I'm sorry, I did on mistake, but he didn't do that. He just come close to us and come to mellike (indicating). So this one with my booty, we was just touch each other and that's how I got angry. If — if this was water, I should have let it go, but when she's [sic] feeling my booty, I	2 3 4 5 6 7 8 9 10 11 12 13	A	I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everyone he everywhere he wanted to go because he's a supervisor. Okay. Now, didn't Abigail say Well, let's strike that. There was an investigation about this incident, right? (In English without translation of question)
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A.	you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe he's coming to say, I'm sorry, I did on mistake, but he didn't do that. He just come close to us and come to me like (indicating). So this one with my booty, we was just touch each other and that's how I got angry. If — if this was water, I should have let it go, but when she's [sic] feeling my booty, I feel so bad and that's why I went to report to Scott Reed.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A	I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everyone he everywhere he wanted to go because he's a supervisor. Okay. Now, didn't Abigail say Well, let's strike that. There was an investigation about this incident, right? (In English without translation of question) Yeah. Steve, he came he told me to show him what happened
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A	you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe he's coming to say, I'm sorry, I did on mistake, but he didn't do that. He just come close to us and come to me like (indicating). So this one with my booty, we was just touch each other and that's how I got angry. If—— if this was water, I should have let it go, but when she's [sic] feeling my booty, I feel so bad and that's why I went to report to Scott Reed. So he brushed by you and Abigail, right, you were ——	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A	department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everyone he everywhere he wanted to go because he's a supervisor. Okay. Now, didn't Abigail say Well, let's strike that. There was an investigation about this incident, right? (In English without translation of question) Yeah. Steve, he came he told me to show him what happened Steve Fergen? yes, and I show him what happened.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A	you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe he's coming to say, I'm sorry, I did on mistake, but he didn't do that. He just come close to us and come to me like (indicating). So this one with my booty, we was just touch each other and that's how I got angry. If — if this was water, I should have let it go, but when she's [sic] feeling my booty, I feel so bad and that's why I went to report to Scott Reed. So he brushed by you and Abigail, right, you were — (In English without translation of question) Abigail — Abigail, she was out here washing	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A	I know they transfer him from his department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everyone he everywhere he wanted to go because he's a supervisor. Okay. Now, didn't Abigail say Well, let's strike that. There was an investigation about this incident, right? (In English without translation of question) Yeah. Steve, he came he told me to show him what happened Steve Fergen? yes, and I show him what happened. And do you know if human resources interviewed people?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. Q.	you see over here, it was here on the middle, we put the socks on it, so it was kind of like a little bit space between. It was a tight space? (In English without translation of question). Yeah, between this table over here on the socks. So when the rest come, I thought maybe he's coming to say, I'm sorry, I did on mistake, but he didn't do that. He just come close to us and come to mellike (indicating). So this one with my booty, we was just touch each other and that's how I got angry. If—— if this was water, I should have let it go, but when she's [sic] feeling my booty, I feel so bad and that's why I went to report to Scott Reed. So he brushed by you and Abigail, right, you were—— (In English without translation of question) Abigail —— Abigail, she was out here washing her face. Okay. So he ——	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A	department, but Scott already told me, I have no right to stop Rusty anyway he wanted to go. Okay. So he had to he have to come because I told him, I said, please, tell Rusty I don't want him to be close to me, but he said you don't have a right to stop Russ to go everywhere he everyone he everywhere he wanted to go because he's a supervisor. Okay. Now, didn't Abigail say Well, let's strike that. There was an investigation about this incident, right? (In English without translation of question) Yeah. Steve, he came he told me to show him what happened Steve Fergen? yes, and I show him what happened. And do you know if human resources interviewed people? (In English without translation of question) I don't know.

1	,500,000	atthrieta roods, Inc.		May 24, 2016
1		265		267
1	A.	(In English without translation of question)	1	that's how the doctor say said it.
2		I don't know. I just my doctor just	2	(Naambwe Deposition Exhibit 26 marked.)
3		checking on me and give me the medicine. And I	3	Q. All right. You've been handed what's been marked
4		remember one of my anxiety doctor, she ask me	4	as Exhibit 26, and this is a form that says your
5		to to take FMLA and I said I already have FMLA	5	FMLA leave request is approved. Have you seen
6		already and she said okay, because this medicine	6	this before?
7		we give to you might be make you so tired and	7	A. I haven't seen this kind of form.
8		sleepy so you have to take FMLA.	8	Q. Okay. Is Kalee Olson one of the the doctors
9	Q.	Okay. And you've reported to your doctor that	9	that you see?
10		you have hallucinations, you see people who are	10	A. Yes.
11		not there. Is that accurate?	11	Q. Okay. And so this is the request for FMLA leave
12	A.	(In English without translation of question)	12	intermittently? It says on the third page of
13		Yeah, sometimes.	13	this document, it says frequency one time per
14	Q.	Does that happen at work?	14	month, two days per episode that you will need
15	A.	(In English without translation of question)	15	the leave? Have you taken this leave?
16		Like that day, I I was almost fall	16	A. I didn't I didn't know this.
17		down	17	Q. You have not taken this leave?
18		(Sotto voce discussion between witness and	18	A. I didn't see I haven't seen this I didn't
19		interpreter.)	19	see this paper or I didn't know they approved
20	A.	One time, one day I was almost passed out. I	20	they approved my FMLA.
21		was	21	Q. Okay. Now, are you saying that your condition,
22	Q.	It says in your medical records that sometimes	22	this mental illness, is because of what happened
23		you black out, you don't remember what's happened	23	at work?
24		for a little while. Does that happen at work?	24	A. Yes. That's that's when it started.
25	A.	Yeah, it happened at work.	25	Q. And which incident at work are you talking about
		266		268
1	Q.	Did you tell your doctor that sometimes you see	1	that started this?
2		people in flashes of light across the room?	2	A. The first thing was when I was being called a
3				The state of the s
-	A.	Yes, I see some things like that.	3	monkey, I'm not a human. And the second was the
4	A. Q.	Yes, I see some things like that. And does that happen at work?	3	monkey, I'm not a human. And the second was the
5				
1000	Q.	And does that happen at work?	4	fact that I found out I don't have a right at
5	Q.	And does that happen at work? All of that started when I started when this	4 5	fact that I found out I don't have a right at work. And the third and the third, it it
5	Q. A.	And does that happen at work? All of that started when I started when this problem started at work.	4 5 6	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company,
5 6 7	Q. A.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March	4 5 6 7	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they
5 6 7 8	Q. A. Q.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right?	4 5 6 7 8	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I
5 6 7 8 9	Q. A. Q.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right? Yes.	4 5 6 7 8 9	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I am exactly a monkey.
5 6 7 8 9	Q. A. Q.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right? Yes. Okay. And your FMLA was related to these	4 5 6 7 8 9	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I am exactly a monkey. Q. That shows that you are a monkey?
5 6 7 8 9 10 11	Q. A. Q. A.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right? Yes. Okay. And your FMLA was related to these symptoms, right?	4 5 6 7 8 9 10	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I am exactly a monkey. Q. That shows that you are a monkey? THE INTERPRETER: Yeah, or animal, she said,
5 6 7 8 9 10 11 12	Q. A. Q. A.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right? Yes. Okay. And your FMLA was related to these symptoms, right? (In English without translation of question)	4 5 6 7 8 9 10 11 12	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I am exactly a monkey. Q. That shows that you are a monkey? THE INTERPRETER: Yeah, or animal, she said, because they treated me differently
5 6 7 8 9 10 11 12 13	Q. A. Q. A. Q.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right? Yes. Okay. And your FMLA was related to these symptoms, right? (In English without translation of question) Yeah.	4 5 6 7 8 9 10 11 12 13	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I am exactly a monkey. Q. That shows that you are a monkey? THE INTERPRETER: Yeah, or animal, she said, because they treated me differently differently than the other people.
5 6 7 8 9 10 11 12 13 14	Q. A. Q. A. Q.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right? Yes. Okay. And your FMLA was related to these symptoms, right? (In English without translation of question) Yeah. And currently you have a request for well,	4 5 6 7 8 9 10 11 12 13 14	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I am exactly a monkey. Q. That shows that you are a monkey? THE INTERPRETER: Yeah, or animal, she said, because they treated me differently differently than the other people. Q. But just to be clear, nobody has ever called you
5 6 7 8 9 10 11 12 13 14 15	Q. A. Q. A. Q.	And does that happen at work? All of that started when I started when this problem started at work. All right. Well, these symptoms started in March of 2017, right? Yes. Okay. And your FMLA was related to these symptoms, right? (In English without translation of question) Yeah. And currently you have a request for well, you've been granted FMLA leave intermittently	4 5 6 7 8 9 10 11 12 13 14 15	fact that I found out I don't have a right at work. And the third and the third, it it looks like I I don't matter in the company, I'm nothing. The fourth is the fact how they treated me. That seems or that shows that I am exactly a monkey. Q. That shows that you are a monkey? THE INTERPRETER: Yeah, or animal, she said, because they treated me differently differently than the other people. Q. But just to be clear, nobody has ever called you a monkey since that Scott Genzler incident,
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		and the state of t			200
		269			271
1	11	me for the Grade 2 and 3 when I'm working there.	1	Q.	All right. Is there anything else that's
2	Q.	That was that resolved through the union?	2		happened during this period of time from 2014 to
3		THE INTERPRETER: Yeah. She told Rick.	3		the present that has caused you any emotional
4		COURT REPORTER: Pardon me? Say it again.	4		distress?
5		THE INTERPRETER: Is it Rick or Russ?	5	A.	What I want to speak, I didn't I didn't put it
6		THE WITNESS: Rick.	6		down or speak of Russ, notify anybody on this
7		MS. CALEM: Rick. She told Rick.	7		case.'
8		THE INTERPRETER: She told Rick.	8	Q.	I don't think I understood what you said.
9		BY MS. CALEM:	9		THE INTERPRETER: She said she want to say
10	Q.	And did was the pay changed?	10		something, but that is outside of what you guys
11	Α.	When Rick told him, they I saw, like, three	11		have here in this case. That is outside of this.
12		two or three checks different on those checks,	12		THE WITNESS: (In English) But it happened
13		and then after that, it went back to normal, to	13		at work. I didn't report it, but it happened at
14	10	regular pay that I was getting before.	14		work. But one only one incident I reported in
15	Q.	During the time that you have worked at	15		the check on the camera.
16		Smithfield, have you had any difficulties with	16		COURT REPORTER: Is it "and they checked on
17		your children?	17		the camera"?
18	A.	No.	18		THE WITNESS: (In English) Yeah.
19	Q.	Did your son have any problems with any legal	19	Q.	So you're saying something happened at work?
20		problems?	20	A.	(In English without translation of question).
21	A.	The one who I had, he is in Dallas, he's not with	21		Yeah, in 2000 I think I can say August
22		me.	22		2013. That's how it started. I guess it was in
23	Q.	Is what?	23		August, I guess.
24		THE INTERPRETER: One of my son went back to	24	Q.	Something happened at work? Oh, is this when
25		Dallas so he does not he doesn't live with me.	25		you
		270			272
1		BY MS. CALEM:	1	A.	75 - 73:
1 2	Q.	BY MS. CALEM:	1 2	A.	(In English without translation of question) When I started working.
	Q.			A. Q.	(In English without translation of question)
2	Q.	BY MS. CALEM: After the incident where Russ brushed by you, did	2		(In English without translation of question) When I started working.
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2 3 4	Q. A.	BY MS. CALEM: After the incident where Russ brushed by you, did you tell your doctor you felt he was trying to touch you in the vaginal area as well as the	2 3 4	Q.	(In English without translation of question) When I started working. Is this the conflict with Saba and you thought she was trying to run over you with her car?
2 3 4 5		BY MS. CALEM: After the incident where Russ brushed by you, did you tell your doctor you felt he was trying to touch you in the vaginal area as well as the as your behind? I told my doctor that when when Russ passed by	2 3 4 5	Q. A.	(In English without translation of question) When I started working. Is this the conflict with Saba and you thought she was trying to run over you with her car? (In English without translation of question).
2 3 4 5 6		BY MS. CALEM: After the incident where Russ brushed by you, did you tell your doctor you felt he was trying to touch you in the vaginal area as well as the as your behind?	2 3 4 5 6	Q.	(In English without translation of question) When I started working. Is this the conflict with Saba and you thought she was trying to run over you with her car? (In English without translation of question). Right.
2 3 4 5 6 7	Α.	BY MS. CALEM: After the incident where Russ brushed by you, did you tell your doctor you felt he was trying to touch you in the vaginal area as well as the as your behind? I told my doctor that when when Russ passed by so I felt him behind me, not right close.	2 3 4 5 6 7	Q. A. Q.	(In English without translation of question) When I started working. Is this the conflict with Saba and you thought she was trying to run over you with her car? (In English without translation of question). Right. Okay. You did report that?
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		273			275
1		No. (Through interpreter) No. I don't have	1		Tom, he give to me.
2		anything.	2	Q.	And you're saying Lamar has asked you to be his
3	Q.	Okay. There's references in some of your medical	3		girlfriend?
4		notes to being in an abusive relationship. Are	4	A.	(In English without translation of question)
5		you in an abusive relationship?	5		Huh?
6	A.	I never said that I had I was in abuse	6	Q.	Are you testifying that Lamar has asked you to be
7		abusive relationship, but we had this argument	7		his girlfriend?
8		with my husband, with my then husband, so he	8	A.	(In English without translation of question)
9		took he went on his own and I went on my own	9		Right. And he said, I want to marry you and
10		so that	10		I said no. And that's why I went to African
11	Q.	When did that happen?	11		store, find something for \$10 and I put on my
12	A.	That was in 2011.	12		finger and say, I have married, I have a husband
13	Q.	Okay. Are you in a relationship with Tom	13		so please leave me alone.
14	13	Anderson?	14	Q.	Okay. And did you ever on any other occasion
15	Α.	(In English without translation of question)	15		show your coworkers a ring and tell them Tom gave
16		No.	16		this to me
17	Q.	Have you ever heard Tom refer to you as his	17	A.	(In English without translation of question)
18	- 8	girlfriend?	18		No.
19	Α.	No. He's just my coworker. He's a union and I'm	19	Q.	and we're going to get married?
20		an employee. That's it.	20	A.	(In English without translation of question)
21	Q.	Have you ever heard Tom say that after you win	21		They see me with the ring, but, no, after
22		this lawsuit and win a lot of money, he and you	22		Lamar, he leave me alone and I take it off.
23		are going to go to Florida together?	23		MS. CALEM: Okay. Let me go off the record
24	A.	(In English without translation of question)	24		and review my notes.
25		Oh, my goodness. No, never. Florida	25		VIDEOGRAPHER: Okay. We're going off the
		274			276
1	Q.	274 Do you know if Thomas told anybody else at work	1		276 record. Okay. We're off the record.
1 2	Q.		1 2		
	Q.	Do you know if Thomas told anybody else at work			record. Okay. We're off the record.
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		ithrield roods, inc.	_		May 24, 2010
		281			283
1		diagnoses in your medical records.	1		incidents or whatever happened, I had never went
2	A.	So I didn't think that I develop that PTSD in my	2		to a hospital for those for that kind of
3		country because it never did felt like real war	3		problem or that kind of issue, so I never had
4		because we were afraid. If we had, like, the war	4		anxiety or high blood pressure before that.
5		is happening today, you know, close by town, then	5	Q.	So this shocking violence did not cause any of
6		we just afraid.	6		these symptoms, but what happened at John Morrell
7	Q.	You've said in your complaint that you suffered	7		with Scott Genzler caused caused the symptoms?
8	2	shocking violence. Did you?	8		THE INTERPRETER: No, she said. She said I
9		THE INTERPRETER: Shocking violence, right?	9		came here in United States back in 2004.
10		MS. CALEM: Yeah.	10		Since from 2004, I have been gone to the
	Α.	From who, for what?	11		hospital. If you want the record, you can follow
12	Ω.	In your complaint, it says you came to the United	12		through the hospital the problem that I was
13	ν.	States after suffering shocking violence as a	13		there. I never, ever went to hospital for this
14			14		kind of issue or this kind of symptoms.
15		victim of genocide and civil war in your country.	15	Q.	Okay.
16		THE INTERPRETER: She doesn't recall when	16	A.	So you can go through my record, through my
- W. S. S. S.		she said that, if it was in January or back in to	17	Α.	social security if you want, and try to see
17		the U. S. Government.	18		
18	_	BY MS. CALEM:			what
19	Q.	Okay. Look at Exhibit 5, that's your complaint.	19	Q.	I believe you. So your testimony is you were
20		Do you not have it? Maybe I have it over here.	20		basically fine until all of this started at John
21		(Sotto voce discussion between witness and	21	207	Morrell; is that right?
22		interpreter.)	22	A.	(In English without translation of question)
23	Q.	Do you have the complaint or do you want me to	23		Yeah. (Through interpreter) Yes.
24		give you a copy?	24		MS. CALEM: Okay. I don't have any other
25	A.	I don't have a 5.	25		questions.
		282	ar		284
1	Q.	Exhibit 5?	1		MS. POCHOP: We will read and sign.
2	A.	I have a 26.	2		MS. CALEM: It's been a very long day.
3	Q.	Oh, you know why, because this (indicating) is	3		Thank you for your forboarance
4		on, you know why, because this (indicating) is			Thank you for your forbearance.
50.00		Exhibit 5, I'm sorry.	4		VIDEOGRAPHER: This is the conclusion on the
5		10 CON 1000 1000 100 100 100 100 100 100 100	4 5		VIDEOGRAPHER: This is the conclusion on the deposition. It's May 24th, 2018. Time 1544
50.00	A.	Exhibit 5, I'm sorry.	4		VIDEOGRAPHER: This is the conclusion on the
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